

JUDGE ENGELMAYER

UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK

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XIONG XIANMIN a/k/a SINO a/k/a FRANK,

Plaintiff,

-against-

GUO BAOSHENG,
GUO WENGUI a/k/a MILES KWOK,
FU KEWEI,
SUN YAN, and
ZHAO YAN,

Defendants
-----X

Plaintiff Xiong Xianmin a/k/a Frank a/k/a SINO (hereinafter "Plaintiff" or "SINO"), by Pro Se, as and for his complaint against Defendants Guo Baosheng, Guo Wengui a/k/a Miles Kwok (hereinafter "KWOK"), Fu Kewei, Sun Yan, and Zhao Yan (collectively "Defendants") hereby alleges as follows:

Part 1. PRELIMINARY STATEMENT

1. This action is brought against Defendants Guo Baosheng, KWOK, Fu Kewei, Sun Yan, and Zhao Yan.
2. Defendants have engaged in intentional acts designed to harass and intimidate Plaintiff, including to stalk/assault/harass/defame Plaintiff.
3. Defendants' conducts were knowing, malicious, willful and wanton and/or showed a reckless disregard for Plaintiff's rights and have caused, and will continue to cause disgrace, humiliation, shame, permanent harm to the personal reputation of Plaintiff, and severe mental anguish and emotional distress, and resulted mental/psychiatric disease to Plaintiff.
4. This action is brought to hold Defendants to account for their wanton and malicious acts of defamation/stalking/assaulting/cyber-attacking and to compensate those their deluded efforts have harmed.

18 CV 4362

Index No.:

COMPLAINT

Jury demanded

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
MAY 16 2018

Part 2. JURISDICTION AND VENUE

5. Plaintiff is an adult citizen of the State of New York for purposes of diversity jurisdiction under 18 U.S.C § 1332.

6. Defendants are all adult residents of the State of New York or the State of Virginia for purposes of diversity jurisdiction under 18 U.S.C § 1332.

7. This Court has original subject matter jurisdiction with respect of this action pursuant to 18 U.S.C § 1332 as there exists complete diversity of citizenship between Plaintiff and Defendants and the amount in controversy exceeds \$75,000, exclusive of interests and costs.

8. Defendants are each subject to the jurisdiction of this Court pursuant to 18 U.S.C § 1332 with proper venue pursuant to 18 U.S.C § 1332 as all defendants are of and/or are domiciled in this district and the events giving rise to the claims occurred in this district.

Part 3. EXHIBITS REFERENCE STATEMENTS

9. Exhibits are attached as “Exhibit DVD” in DVD format and “Exhibit DOC” as word file format, and are numbered in the format **Exhibit V-n**, where n is a number may up to 200.

10. Each **Exhibit V-n** in “Exhibit DVD” is a true and accurate copy of relevant video which may include oral text statements either in Chinese or in English excerpted from a video or a document excerpted from the web or other sources.

11. Each **Exhibit V-n** in “Exhibit DOC” is the contents in Chinese and partial of its English translation associated with the **Exhibit V-n** in “Exhibit DVD”.

12. Hereafter, “as shown in **Exhibit V-n**” will be referred as or a short abbreviation for “attached hereto as **Exhibit V-n** is a true and accurate copy of the video or text statements in Chinese or English excerpted from the indicated video or a snapshot of web post with detailed information, including www address, posting time, starting and ending time in the original post or document described in **Exhibit V-n**”.

13. KWOK’s native language is Mandarin. Some statements/speeches shown in the **Exhibit V-n** appeared in Mandarin. Plaintiff’s native language is also Mandarin, and he has verified the accuracy of the translations that appear herein.

Part 4. DEFINITIONS AND TERMINOLOGIES

14. Since early 2017, KWOK has used various social media, such as YouTube, Twitter, Facebook, GUO.MEDIA, etc., to post speech or written statements. KWOK's statements are mainly in his native language Mandarin. In addition, KWOK has created some of his own terminologies with special meaning. Some of this kind terminologies are listed below.

15. “国安”, the Ministry of State Security of the People's Republic of China (“**MSS**”) is one of the Chinese spy agency similar to KGB or CIA.

16. “公安”, the Ministry of Public Security of the People's Republic of China (“**MPS**”) is one of the Chinese spy agency similar to FBI.

17. “国保”, Domestic Security Bureau (“**DSB**”), a branch of MPS and is mainly targeting at Chinese dissidents inside China.

18. “总参情报部”, the General Staff Headquarters Intelligence Department (“**GHID**”) is the military spy agency of the People's Liberation Army (“**PLA**”).

19. “大政保”, Super Politics Safeguard (“**SPS**”) is a secrete organization similar to GESTAPO. But unlike GESTAPO, it doesn't known to public. Its members might work for various spy agencies such as MSS, DSB, or GHID.

20. “政法委”, the China Committee of Politics and Legislative Affairs (“**CCPLA**”) is a powerful branch of the Chinese Communist Party (“**CCP**”) which controls government agencies relevant to stated security and legal affairs, including MSS and the Chinese Ministry of Public Security (“**MPS**”).

21. “**Chinese dissident**” is normally used in Chinese as the Chinese who have devoted themselves to the pro-democracy movement and have been persecuted by Chinese government and especially followed/monitored by MSS or GHID for political reasons.

22. “**Exiled Chinese dissident**” is a Chinese dissident who are exiled out of China.

23. “**Chinese spy**” normally means those Chinese who have been worked or linked to Chinese spy agencies, including MSS or GHID.

24. **Ma Jian**, the Vice Minister of MSS from 2006 to 2015 , served as Chinese spy in his

whole career. Upon public information and belief, Ma Jian has been in charge of the Chinese spy group to monitor/follow/persecute exiled Chinese dissidents since 1989.

25. **Zhang Yue**, a top official for MSS and later for CCPLA.

26. **Lin Qiang**, a top official for MSS and later for CCPLA.

27. Upon public information and belief and upon statements of KWOK, Ma Jian, Zhang Yue, Lin Qiang, are all close friend of KWOK and they had worked together to lead and in charge of the Chinese spy group to monitor/follow/persecute exiled Chinese dissidents from 1989 to 2015. However, KWOK always claimed those Chinese spies were Chinese dissidents, and alleged most of the real Chinese dissidents as Chinese spies. KWOK might have his own definitions for Chinese spy and Chinese dissidents.

28. “推友” (“**Twitter friends**”) is a word frequently used by KWOK and his supporters. “Twitter friends” is always used by KWOK as the first greeting words at the beginning in most of his statements. Originally, “Twitter friends” was considered all the registered Twitter users. But what KWOK use it to mean all of his supporters who can view his video or posts through internet.

29. “推特党” (“**Twitter Party**”) is a group or a party set up by some of KWOK’s supporters. Its main objective and requirement is to support KWOK without hesitation.

30. “挺郭会” (“**KWOK’s Endorsement**”), a worldwide organization with KWOK as its supreme leader and sponsor.

31. “小蚂蚁” (“**little ant**”), a name for KWOK’s supporters to call themselves, especially for KWOK’s female supporters. Moreover, KWOK’s supporters are very proud to be called “little ant with no brains”.

32. “老蚂蚁” (“**old ant**”), a name for KWOK’s supporters to call themselves, especially for KWOK’s male supporters.

33. “独狼” (“**wolf warrior**”), a name for KWOK himself and for some aggressive old ants who are more anxious to fight with armed weapons for KWOK. KWOK normally expects his junior supporters to be little ants, then to become old ants, and eventually to become wolf

warriors.

34. “持枪党”(“**Gun Party**”), a group of KWOK’s supporters and sponsored by KWOK, and most of its members own weapons and frequently show off their weapons to threaten those who are targeted by KWOK.

35. “光头党”(“**Skinhead Party**”), another name for the Gun Party, especially members of the Gun Party with skinhead.

36. “**Himalaya**” is known as one of the highest mountain in China. However, KWOK frequently uses it to mean something different from a mountain. KWOK has never clearly explained what does he mean by crying Himalaya. Sometimes he means it a great war to be happen in the near future between his ants group and his enemy, and sometimes he means it a heaven or utopia that the little ants dreamed of, and sometimes he just uses it as a exclamation cry without any real meaning, similar to Hallelujah.

37. Blue-Golden-Yellow (“**BGY**”), based on KWOK’s statements, is a plan designed by the CCP spy agencies to buy some agencies or individuals to work as spies for the Chinese government. KWOK uses BGY not only as a noun which particularly means that plan, but also as a verb which means that someone is paid by the CCP. For example, KWOK repeatedly claimed that VOA, BBG, FBI, Twitter, Facebook, YouTube, and some US lawmakers were BGYed by the Chinese spy agencies to make them work or cooperate with CCP.

38. “**Everything is just beginning**” is used as the end sentence for most of KWOK’s statements, which means nothing rather than an ending exclamation shout.

39. “伪类”(“**Weilei**”) is a word frequently used by KWOK in his statements, which he explained as “faked human” or “son of bitch” or “garbage”. In fact, he called all those who didn’t support him or he hated as Weilei.

40. “八大伪类”(“**8-Weilei**” or “the 8 Chinese dissidents”) is also frequently mentioned in KWOK’s statements on daily basis, which particularly means the following 8 Chinese dissidents: LIU, Xianmin Xiong a/k/a Sino (hereinafter “SINO”), Wei Shi, Xia Yeliang, Li Hongkuan, Li Weidong, Tang Baiqiao, and Teng Biao. Upon information and belief, all the above mentioned 8

Chinese are well-known Chinese dissidents and human rights activists. However, KWOK alleged that all of them were Chinese spy agents and received huge amount money from Chinese spy agencies.

41. KWOK also gave various dirty names to each of them. For example, 瘤肛 (“Anal Tumor”), 刘精神病 (“Liu mental”), 刘掏肛 “Liu Cancer”, “Liu Rapist”, 流氓 (“Liu Rouge”) to LIU; 屎诺 (“Shit SINO”) to SINO; 伪屎 (“Wei Shit”) to Wei Shi; 夏痔疮 (“Xia Hemorrhoid”) Xia Yeliag; 李红薯 (“Li Potato”) and 太监李 (“Eunuch Li”) to Li Hongkuan; 癞蛤蟆李 (“Toad Li”) to Li Weidong; 唐骗捐 (“Tang Con Man” or “Tang Fraud”) to Tang Baiqiao; and 乱伦彪 (“Incest Biao”) to Teng Biao. All these dirty names have been widely spread on internet and are widely used by KWOK’s supporters.

42. Since August 2017, KWOK has frequently claimed that he would file lawsuits against each of the 8-Weilei for raping or sexual harassment, and he claimed he would pay big award to anyone who would like to file such kind lawsuits against them.

43. “91-伪类” (“91-Weilei”). KWOK’s list of Weilei is not stopped at 8. Instead, it keeps expanding fast. In early 2018, KWOK claimed that he had listed 91 individuals on his Weilei list, including Hu Ping, Zhang Lifan, Chen Jun, Huang Hebian, Lin Yudan, Ho Pin, Chen Xiaoping, Yuan Jianbin, etc. Of course, KWOK wouldn’t forget to give dirty names to each of them, such as 胡评 (“Vain Comment”), 章痔疮 (“Zhang Hemorrhoid”), 陈公公 (“Chen Eunuch”), 黄河跳 (“Yellow River Jumper”), 母猴子 (“Female Monkey”), 豹子何 (“Leopard Ho”), 斑马陈 (“Zebra Chen”), 袁吸毒 (“Drug Abuser Yuan”), to the above mentioned new Weilei respectively. KWOK claimed that lawsuits against the 91 Weilei had been filed or under processing.

44. KWOK is not only targeting at Chinese dissidents, but also targeting at some Americans who gave him negative comments. For example, Roger Stone, KWOK claims Roger Stone has been spreading falsehoods about him on InfoWars. KWOK has filed lawsuit against the controversial InfoWars host for defamation and asking for \$100 million.¹

45. KWOK also claimed that he would spent \$1 billion to file lawsuit against Interpol.

¹ <https://twitter.com/BillGertz/status/979393090254405632>

KWOK repeatedly stated that he would file lawsuits against VOA, Twitter, Facebook, YouTube, Hudson Institute for blocking him to be interviewed or to use these media platforms.

Part 5. BACKGROUND OF LIU, A CLOSE FRIEND AND ROOMATE OF SINO'S

46. LIU is and was at all times relevant hereto an adult resident of City of New York, United States.

47. LIU holds a Bachelor's degree in Mechanical Engineering from University of Science and Technology of China, a Master's degree in Physics from Peking University in Beijing, another Master's degree in Computer Science from Columbia University.

48. LIU is a well-known Chinese dissident. LIU is the founder and key leader of the Beijing Democratic Salon ("BDS", founded on May 4, 1989), and the Beijing Students' Autonomous Federation ("BSAF", founded on May 23, 1989).²

49. LIU, along with BDS and BSAF, as well as most of the members of the above mentioned two organizations, played or became important roles in the pro-democracy movements in China, especially in the 1989's Tiananmen democracy movement.³

50. LIU is an active Chinese dissident, and that caused him being targeted/harassed/stalked by Chinese spy agencies even he escaped to the United States and became a US citizen. Chinese spy agencies has never left LIU alone and has repeatedly tried to apply unrestricted warfare strategies to destroy LIU, not only destroy LIU physically, but also mentally and psychically; not only make LIU lost jobs, but also try to make LIU disabled to find jobs, so that to stop LIU to motivate any pro-democratic movement.

Part 6. THE PARTIES: BACKGROUND OF PLAINTIFF SINO

51. SINO is a close friend of LIU. Both of LIU and SINO have been targeted by KWOK since early 2017. To avoid being assassinated/harassed by KWOK or his agents, LIU and SINO have lived together as a family since June 2017.

² https://en.wikipedia.org/wiki/Beijing_Students%27_Autonomous_Federation

³ https://en.wikipedia.org/wiki/Tiananmen_Square_protests_of_1989

52. In most of the cases, the harassment to SINO is also a harassment to LIU whenever they were together.

53. SINO is and was at all times relevant hereto an adult resident of City of New York, United States, residing in a shelter in Wards Island, New York.

54. SINO holds a Bachelor's degree in Aeronautics Engineering from Beijing University of Aeronautics and Astronautics of China, a Master's degree in Computer Engineering from Northwestern Polytechnical University.

55. SINO is a contributing writer and a reporter of Boxun Inc. (collectively, with Boxun News, "Boxun")^{4 5}, Boxun News' corporate entity, which is incorporated in New York. Boxun's mission includes, but is not limited to, reporting on the inner workings of the secretive government of the PRC and publishing revelations about human rights violations in that country.

56. SINO is a writer and has authored/published several books, including "Xi Jinping and His Lover", which caused attention not only to Chinese government, but also media in western countries. Some mainstream media, including VOA, RFA, and BBC, have interviewed SINO⁶, while the Chinese government has sent spies to harass/espionage SINO just because of that book.

57. Just because of SINO's book, Chinese government also sent spies or intelligent agencies to kidnap some book distributors or book sellers in Hong Kong, such as Gui Minhai, Lv Bo, Zhang Zhiping, Lin Rongji, and Li Bo, who have all worked as employees for Tongluowan bookstore in Hong Kong, and all of them were kidnapped by Chinese spy agents in 2015⁷.

58. SINO is a Chinese dissident. Due to his role in pro-democracy movements in China, and his news reports about China, especially because his published books, SINO has been targeted by Chinese intelligent agencies has been not allowed to go back China since 2014. SINO is considered as one of the enemies of the CCP.

Part 7. THE PARTIES: BACKGROUND OF DEFENDANT FU KEWEI

⁴ <http://en.boxun.com/>

⁵ <https://boxun.com>

⁶ http://www.bbc.com/zhongwen/simp/china/2016/02/160205_hongkong_booksellers_xi_book

⁷ http://www.bbc.com/zhongwen/simp/china/2016/02/160205_hongkong_booksellers_xi_book

59. Upon information and belief, Fu Kewei is and was at all times relevant hereto an adult resident of Virginia State, and currently lives at **1011 Arlington Boulevard, #430, Arlington, VA 22209.**

Part 8. THE PARTIES: BACKGROUND OF DEFENDANT GUO BAOSHENG

60. Upon information and belief, Guo Baosheng is and was at all times relevant hereto an adult resident of Virginia State, and currently lives at **8841 Brown Thraster Ct. Gainesville, VA 20155.**

61. Guo Baosheng is the founder of "Twitter Party", a company registered in Virginia State and mainly conducts business with KWOK's companies, such as circulating KWOK's defamatory statements, creating/spreading faked documents, recruiting accomplices for KWOK and for Golden Spring LTD.

Part 9. THE PARTIES: BACKGROUND OF DEFENDANT SUN YAN

62. Upon information and belief, Sun Yan is and was at all times relevant hereto an adult resident of New York State, and currently lives at **43-70 Kissena 3-70 Kissena Boulevard, Apt 21-G, Flushing, NY, 11355.**

63. Upon information and belief, Sun Yan has been arrested over 4 times for assaulting people who had criticized KWOK.

Part 10. THE PARTIES: BACKGROUND OF DEFENDANT ZHAO YAN

64. Upon information and belief, Zhao Yan is and was at all times relevant hereto an adult resident of Virginia State, and currently lives at **1011 Arlington Boulevard, #430, Arlington, VA 22209.**

65. Upon information and belief, Zhao Yan used to be a Chinese police officer and/or a secret spy agent working for MSS and/or MPS in City of Haerbin, China. Zhao Yan is a well-trained as a spy agent and a military fighter.

Part 11. THE PARTIES: BACKGROUND OF DEFENDANT KWOK

Basic Information

66. KWOK is a PRC national and a real estate billionaire, residing at 781 Fifth Avenue, New York, New York.

67. Upon information and belief, KWOK has lived at 781 Fifth Avenue since March 6, 2015.

68. Upon information and belief, at times relevant hereto, KWOK also maintains offices at 767 Fifth Avenue in the City and State of New York for a foreign corporation named Golden Spring (New York) Ltd. ("Golden Spring"), a Delaware company that KWOK owns, which is registered to do business as a foreign corporation in the State of New York and a registered agent for the service of process in New York.

69. KWOK has carefully cultivated an image of himself as a cultured political dissident who stands up to – and exposes rampant corruption within – the tyrannical government of the PRC.

70. This public persona, however, is a smokescreen, largely facilitated by his considerable personal wealth and prominent connections in the West.

71. In fact, this crafted fiction serves not only to satisfy KWOK's ego and the egos of those who affiliate with him; it further provides KWOK with a means to mask the campaign of intimidation and terror he unleashed upon those few of his employees who dare not submit themselves entirely to his domination and to multitude of business partners who have been forced to institute multiple litigation against him because of his failure to live up to his professional and business commitments.

72. In the **March 31, 2018**, live-streamed YouTube chats with some of his supporters, as shown in **Exhibit V-1**,⁸ KWOK stated that *"Up until now, I have had couple of birth dates, here and there. Legally, it is May 10th, 1968, it can't be changed. However, I have gone my birth place to figure it out, some said this, some said that, no one can figure it out. But I always use May 10th, 1970 as my birth date."* However, he holds at least 11 passports with different names and birth of dates, including **February 2, 1967, May 10, 1968**. Normally, most of Chinese should have

⁸ <https://youtu.be/hZZH8xtNBKg?t=3251> (54:12-54:52)

only one legal BOD. However, it is normal for some Chinese might have multiple BOD and passports if they work for Chinese spy agencies. KWOK was either lied about his BOD, or he was a Chinese spy who could always create a faked identification with faked BOD.

73. It has been reported that KWOK has now sought asylum in the United States, claiming that he has become “a political opponent of the Chinese regime.”

74. KWOK maintains at least one active Twitter account with user ID @KwokMiles, at least one YouTube account under the name “郭文贵”, and at least one Facebook account under the name guowengui. Since **January 2018**, KWOK has started his own media “GUO.MEDIA”, which mainly posts KWOK’s or his supporters’ videos or writings.

KWOK Used to Be a Chinese Elite Spy and thus is Powerful with Spy Resources

75. In the **June 30, 2017** live-streamed YouTube interview with Chen Xiaoping, as shown in **Exhibit V-2**⁹, KWOK stated that he met Ms. Deng Liujin and Mr. Zeng Qingyuan around 1986, while he was only 16 years old. Upon information and belief, Mr. Zeng Qingyuan is Zeng Qinghong’s younger brother, and Ms. Deng Liujin is Zeng Qinghong’s mother, while Zeng Qinghong was used to be Vice President of China and was in charge of the Chinese spy agencies. Most of Zeng Qinghong’s family members, including his brother Mr. Zeng Qingyuan, and his mother Ms. Deng Liujin were all senior spy agents of China. Zeng Qinghong’s family has controlled most of the Chinese spy agencies for long time, especially recruiting and training new elite spies. KWOK also stated that he had been familiar with many of the associates recruited or promoted by Zeng Qinghong, which implies that KWOK was recruited and trained by Zeng Qinghong or Zeng’s family members to be top Chinese spy agent at his teenage. As KWOK was simply a young boy from rural country far away from Beijing at that time, it would be impossible to visit Zeng Qinghong’s house and to meet with Zeng’s family members, unless for an interview or for training purpose to be a spy agent.

76. As shown in **Exhibit V-2**¹⁰, KWOK stated that General Xiong Guangkai and General Ji

⁹ <https://youtu.be/InQo19c1lp4?t=10652> (2:57:32 - 2:58:45)

¹⁰ https://youtu.be/m_O6VpkQMfc (2:56:06 - 2:56:36)

Shengde were both his “big bosses”, while General Xiong Guangkai was the head of GHID from 1988 to 1992, and then General Ji Shengde took over that position from 1992 to 1999. That indicated that KWOK was recruited by the GHID as a military spy agent at his teenage, probably at the time when he met Deng Liujin in 1986! A teenage, even a regular PLA soldier, couldn’t have chances to meet and report to General Xiong Guangkai and General Ji Shengde, unless he was a spy belong to the intelligence department of the PLA.

77. KWOK repeatedly mentioned that he was arrested on **May 23, 1989**, and then was sentenced to 3 years in prison. If this were true, KWOK should be in prison from May 1989 to May 1992. However, KWOK also stated that he stayed in USA in 1989 for one year. KWOK couldn’t be in USA and in Chinese prison for the same time period, and he couldn’t be arrested if he already known many of the top Chinese spies. One reasonable explanation is that KWOK’s arrest in 1989 was simply a surviving training process, which is normal for most junior spies in China. Once he was arrested, he might just stayed in jail for a short time period and then was sent to USA for further training. It would be impossible for KWOK to travel to USA at that time, unless he was sent and arranged by the Chinese spy agency!

78. Around **April 2017**, a video is posted on YouTube, as shown in **Exhibit V-3¹¹**, in which Ma Jian, the ex-Deputy Minister of the MSS, stated that KWOK had worked for Ma Jian since 2006. Ma Jian had provided many helps to KWOK, including providing various identifications and making/robbing money through and using spy power or resources. For example, Ma Jian helped KWOK to monitor and spy on other businessmen, including Xie Jiansheng, Qu Long, Liu Zhihua, and put them into jail through false accusations, and robbed billions of RMB from the above mentioned and other businessmen. Ma Jian clearly stated that KWOK worked for the MSS, and implied that KWOK’s business and money belong to the spy agencies of China, and thus KWOK’s money should be used for the security of China and for spy activities.

79. In the **April 19, 2017** live-streamed VOA interview with Gong Xiaoxia and Dongfang,

¹¹ <https://youtu.be/DmIIXrKL1g0> (3:51 - 9:47)

as shown in **Exhibit V-4**,¹² KWOK stated that his IDs and passports were created/issued by the MSS, such that he had 11 passports from various countries including 3 Middle-East countries, and multiple European countries. The MSS would only issue passports or IDs for its spies and could only be used for spy activities. KWOK stated that he used those IDs to travel around the world to perform tasks assigned by the top Leaders of China, and one of his tasks was meeting/monitoring some “sensitive” Chinese, including Dalai Lama and other exiled Chinese dissidents. That is why the MSS created so many faked IDs and passports for KWOK, and thus that is a solid evidence to prove that KWOK is or used to be a Chinese spy reporting directly to Ma Jian or even senior top Chinese leaders.

80. When asked his relationship with MSS, KWOK responded: *“they (MSS) used to give us a name as “business anchor”, which means you should do whatever they asked you to do. Ah, of course you are not to be asked to espionage or to commit murder. Those who consider our “business anchor” as special agents are ignorant. Because they will not trust you, they will only ask you to provide money, and to use your resources in other countries to serve for them. As for me, just simply to contact with some sensitive people in other countries, to help them to build network relations. That is it. So, they issued the ID card for me. There are very interesting staffs in it.”* Here KWOK clearly stated that he performs espionage tasks which were assigned by MSS and even top leaders of China.

81. In the **May 4, 2017** live-streamed YouTube interview with Qin Weiping, as shown in **Exhibit V-5**¹³, KWOK stated that he was sent by MSS, representing Chinese government and top Chinese leaders, to visit London in 2013, in order to meet the British Prime Minister David William Donald Cameron to resolve the diplomatic crisis due to the planned visitation of Dalai Lama to London. KWOK stated that the Chinese diplomat Minister couldn’t resolve that crisis, however, KWOK solved this serious crisis within 6 hours! KWOK had helped the MSS and Chinese government to resolve many such kind crises, and he had been honored at least 3 times

¹² https://youtu.be/YpRXCISZC_w?t=2369 (39:29 – 45:58)

¹³ <https://youtu.be/WMKF2z0MQ5Y?t=3002> (50:02 – 55:40)

of China National First Class Medals (“NFCM”), which is normally only honored to top Chinese spies in China, and very few Chinese could receive NFCM as many as 3 times in China. KWOK stated that it was the Chinese President Xi Jinping requested to award NFCM to KWOK, and it was awarded by Geng Huichang, the Minister of MSS, directly to KWOK. Upon information and belief, no other Chinese has been awarded NFCM 3 times except KWOK. This clearly shows that KWOK is a top Chinese spy working for both MSS and GHID, at least backed by MSS and GHID.

82. In the **April 19, 2018** live-streamed YouTube interview with Lu De, as shown in **Exhibit V-6¹⁴**, when asked his relationships with Zhang Yue, Ma Jian, and Lin Qiang, KWOK stated that *“He[Zhang Yue] used to work in the Political Department of the Public Security Bureau. During the time of June 4th massacre, he, along with Fu Zhenghua, Lin Qiang, and Ma Jian, the Deputy Minister of MSS, became the core team of the Political Safeguard system. They were in charge of all the significant political activities in China. All the spy networks in abroad are connected to them. Originally, they were middle level spy agents, and later became Minister level leaders or even top leaders of China. They don’t have good relationships. The best guy among them is Ma Jian.”* Here KWOK confessed that Zhang Yue, Lin Qiang, and Ma Jian had been working for MSS as top spy agents and in Charge of monitoring Chinese dissidents since 1989.

83. As shown in **Exhibit V-6¹⁵**, KWOK highly appreciated Zhang Yue, Ma Jian and other Chinese spies and stated that *“Zhang Yue is the most straight and loyal person. He is very handsome and good at daily life. He loves every Chinese dissident from his heart. Lin Qiang is not that kind direct person. Instead, he took actions to support pro-democracy movement directly. His father is Lin Ang. His elder brother is Lin Di. He has been in charge all of gangster related cases, as well as the projects of monitoring on dissidents abroad. Zhang Yue is a soldier recruited or trained by Lin Qiang. However, their innate characters are different. Lin Qiang is a fighter for*

¹⁴ <https://youtu.be/vN3-TBDEEE?t=1443> (24:03-25:01)

¹⁵ <https://youtu.be/vN3-TBDEEE?t=1563> (26:39-30:15)

democracy, while Zhang Yue believes that all the dissidents should be exiled. Normally, Vice Minister Ma Jian didn't like to show his stance, instead he hopes that there would be some big leaders out of the dissidents abroad. He gave high expectations. So, none of them hate the exiled Chinese dissidents. I and Zhang Yue are close friends that can open hearts to communicate. I extremely respect Zhang Yue. This guy loves learning and swimming, very healthy, very direct. He has valuable opinion about democracy and judicial system."

84. KWOK alleged that he had known Zhang Yue and Lin Qiang since 1989 while he was a teenager and the other two had been elite Chinese spies. It is impossible for a teenager to be a close friend of several elite Chinese spies, unless he had been recruited as a Chinese spy and they had been working in the same training camps or in the same spy group.

85. Upon information and belief, Ma Jian, Zhang Yue, and Lin Qiang were well-known notorious lackeys of the CCP, and their roles in CCP were similar to the roles that Heinrich Luitpold Himmler and Gestapo had played for Hitler. However, KWOK praised these CCP spies as **"fighters for democracy and thus they are real Chinese dissidents"**, just because "none of them hate the exiled Chinese dissidents". KWOK repeatedly stated that he himself, along with Ma Jian, Zhang Yue, and Lin Qiang were the gang of four handsome "Young Marshals" in Beijing! At the same time, KWOK accused the real Chinese dissidents, including the 8-Weilei, were Chinese spies! KWOK's statements are equivalent/similar to say that Hitler was a dissident while those who were killed by Hitler were all spies of Hitler's! It is definitely not true, instead, it is absolutely a lie. KWOK simply reverse the black and white.

86. KWOK wanted to convince or even to fool US government that he himself along with other Chinese elite spies were dissidents, so that he could get his Asylum approved. That is KWOK's type of trick or game.

KWOK is a Chinese Billionaire and thus is Powerful Financially

87. Upon information and belief, KWOK is a Chinese billionaire with an estimated net worth in excess of \$50 billion. KWOK owns properties or businesses not only in USA, but also in other countries, including, but not limited to China, Hong Kong, England, and Middle East.

88. As shown in **Exhibit V-2**¹⁶, KWOK stated that he was in jail in 1989, while at the same time, he had accumulated almost billion dollars at that time.

89. In the **June 30, 2017** live-streamed YouTube interview with Chen Xiaoping, as shown in **Exhibit V-7**¹⁷, KWOK stated that he owns 120 billion RMB (about 19 billion USD) assets in China, and his family funds owns/manages \$28 billion outside China. KWOK also stated that he owns at least 5 luxurious apartments in New York with a total estimated value about \$0.35 billion, and his annual expense just for his apartments in New York, his airplanes, and his yacht, was at least \$150 million.

90. In the **November 15, 2017** HBO Show of VICE News Tonight, as shown in **Exhibit V-8**¹⁸, KWOK stated that *"I have the wealthy life that everyone in the world dreams about. I have the biggest house in Hong Kong, thousands of square meters. I have the most luxurious apartment in London. I have the biggest courtyard compound buildings in Beijing. I have more than 10 properties in Pangu. I have two private jets. I have the most advanced yachts. I have hundreds of race cars. I have an apartment like this in New York."*

91. Upon information and belief, KWOK owns at least \$50 billion and thus is very powerful financially.

KWOK Had a Conduct Pattern to Threaten/rob/persecute others Using His Spy Resources

92. Upon information and belief, KWOK's education background is only about five years in primary school, and he has little technical/management/finance skills, and has no inherited wealth, which are necessary and basic pre-requirements to become a billionaire in China. KWOK repeatedly stated that all his money and wealth were completely clean, which means he made money through legal business and hard working. However, KWOK accumulated his wealth most likely through robbing, cheating, money laundering, and tax evasion, especially with helps of the MSS and other Chinese spy agencies to spy/threat/blackmail other businessmen or officials.

93. MSS is China's spy agency which is similar to KGB in Soviet Union time. It has

¹⁶ <https://youtu.be/InQol9c1lp4> (2:56:06-2: 58:45)

¹⁷ <https://youtu.be/InQol9c1lp4> (59:21 – 1:02:01)

¹⁸ <https://youtu.be/LkOsgH5kcgQ?t=402> (6:41 – 7:04)

privilege power, including to monitor/arrest/jail or even kill whoever it targets at. In fact, MSS maintains a database which includes videos/tapes/profiles that can be used as evidences to put any Chinese into jail, including President Xi Jinping, as long as MSS wishes to do so. With MSS and GHID as his backup forces, KWOK can make big money easily.

94. One pattern for KWOK to make easy money is the so called "Fishing People from Prison".

95. For example, on **August 17, 2017**, during the trial at the court of Dalian in Liaoning Province of China, Zhao Yun'an described how he was robbed and threatened by KWOK, as shown in **Exhibit V-9**¹⁹. Zhao Yun'an, the ex-President of Huatai Ltd., was arrested in May, 2008, due to economic disputes. KWOK proposed to help Zhao Yun'an out of prison in exchange of 100 million RMB in cash. However, once Zhao Yun'an was released, he couldn't pay KWOK 100 million RMB in cash. Then KWOK sent his security guards occupied and took over Huatai Lit., which with market value over billions RMB. KWOK created faked licenses of Huatai and sold 30% Huatai's common stocks and get 400 million RMB! KWOK frequently threatened to kill Zhao Yun'an and Zhao's family members, if Zhao tried to sue KWOK. By fishing out one prisoner out of prions, KWOK made 400 million RMB! There are about millions prisoners in China. That is a huge potential business for KWOK!

96. KWOK can make big money not only through fishing people out of prison, but also through sending people into prison. Here just list some of such kind examples.

97. As shown in **Exhibit V-3**, Ma Jian confessed that he had helped KWOK to monitor/threaten/blackmail Xie Jiansheng over 18 months, eventually got some video tapes or evidences that can put Xie Jiansheng into prison. Then KWOK blackmailed Xie Jiansheng to surrender his business and wealth to KWOK. KWOK forced Xie to go to other countries to avoid being arrested by MSS in charge by Ma Jian. KWOK made multi-billion RMB by simply blackmailing Xie Jiansheng, a businessman in Henan Province.

98. On July 13th, 2001, Beijing was declared as sponsor of the 2008 Olympic Games. Since

¹⁹ <https://youtu.be/GYvHbdBpHw4?t=10> (0:11 – 1:40)

then, real estate in Beijing became very profitable. However, only those Chinese businessmen who have close relationships with government officials could get Olympic related projects in Beijing. Upon information and beliefs, Lin Qiang and Lin Di are brothers and both of them worked as senior leaders of the CCPLA, which is the parent body of MSS and some other Chinese intelligence agencies. With helps of Lin Qiang and Lin Di, and some other Chinese top officials, KWOK won a high-profit project—to build Pangu Plaza—a luxury hotel/office building dedicated to the Olympic Game in Beijing. KWOK got the Pangu Plaza project through privilege power of Chinese intelligent agencies. However, after two years construction, in 2005, KWOK's Pangu Plaza project turned out to be a failed project—it had contractual dispute and had about 0.3 billion RMB in arrears. Mr. Liu Zhihua, Deputy Mayor of Beijing in charge of the Olympic related projects at that time, had to overrule the Pangu Plaza project and put it on bidding to other interested investor. Through bidding, Beijing Capital Land Corp. got the land that was originally assigned to Pangu Plaza. Then Liu Zhihua and whoever took over this project became enemies of KWOK and need to be destroyed.

99. In order to get back the Pangu Plaza project, KWOK started to destroy Liu Zhihua through false accusation and blackmail. On **May 11, 2017**, KWOK published a video recording of himself to his “郭文贵” YouTube account, as shown in **Exhibit V-10**²⁰, wherein KWOK described details about how did he work with Ma Jian and other Chinese senior spies of MSS to blackmail Liu Zhihua. KWOK, along with a group of other spies led by Ma Jian, had started to monitor and follow Liu Zhihua since 2004, so that they could collect evidences to send Liu Zhihua to jail. KWOK eventually got tapes that Liu Zhihua dating with other females, including Ms. Huang Yan and Ms. Wang. Then, based on such kind videos, Liu Zhihua was arrested on **June 9, 2006**, and sentenced to death!

100. Liu Xiaoguang, the Chairman of the Beijing Capital Land Corp., who got the land that was originally through bidding, was arrested on **June 16, 2006**. Mr. Jin Yan, who was in charge for that bidding, was also arrested. Just 3 months later, KWOK got back the lands for Pangu Plaza

²⁰ <https://youtu.be/usXIqIb18G0> (18:00 - 27:22)

project, with which KWOK made multi-billion USD.

101. On **May 6, 2017**, KWOK published a video recording of himself to his “郭文贵” YouTube account, as shown in **Exhibit V-11**,²¹ wherein KWOK stated that Ma Jian helped him to monitor Liu Zhihua day and night to get/create the desired videos which sent Liu Zhihua to death roll.

102. Qu Long used to be a business partner of KWOK, and later on became a victim of KWOK. On **November 1, 2017**, Qu Long hold a public media conference to disclose how he was persecuted by KWOK, as shown in **Exhibit V-12**,²² wherein Qu Long described in details about how KWOK and MSS made Qu Long into jail and robbed Qu Long’s multi-billion RMB wealth and stocks. On **March 31st, 2010**, Qu Long was arrested by a group of secret police officers led by Gao Hui, a director of MSS, and Qu Long was accused to own guns. However, MSS had never found any guns from Qu Long’s cars nor Qu Long’s home. Actually, it was a kidnapping. Since MSS doesn’t has authority to deal with this kind cases, and KWOK also sent some of his private security guards to join the kidnapping of Qu Long. Qu Long then was sent to a prison in He Bei, which was in charge by Zhang Yue, who was also worked for Ma Jian and KWOK. Zhang Yue sent his police officers to torture Qu Long in prison, and forced Qu Long to surrender most of his wealth to KWOK, including stocks of Zhongyin (中垠) and China Minzu Securities (中国民族证券) hold by Qu Long, with estimated value over billion USD. Qu Long was later sentenced to 15 years in jail.

103. Li You was another business partner of KWOK, and later became a victim of KWOK and MSS. On **August 3, 2017**, a video was published on YouTube, as shown in **Exhibit V-13**,²³ wherein several phone conversations between KWOK and Li You are recorded. In one of the phone conversations, KWOK described his plan for how to destroy/rob Li You. KWOK stated that he could get all of Li You’s money and assets simply through the following four steps:

- a) First, let Ms. Yu Li take over Li You’s President position by squeezing Li You out of the

²¹ <https://youtu.be/RaA6DVaXFwg> (15:43–17:03)

²² <https://youtu.be/ggbzi16raZo> (9:26 –13:00, 32:10 – 33:18, 36:56–39:27)

²³ https://youtu.be/Gv5cZ_eFy7Y (2:45–3:39, 5:15 – 8:56)

Piking University Founder Group Corp, which has market value over 100 Billion USD.

KWOK stated that he had made Yu Li for him by sleeping with her over 3 times.

- b) Secondly, file report to MSS and other government agencies against Li You.
- c) Put Li You into prison.
- d) Finally, transfer Li You's company and assets to KWOK.

By applying these well designed traps, KWOK eventually sent Li You into jail. Li You was sentenced to 4.5 years in prison on **November 25, 2016**, and KWOK made multi-billion USD by looting Li You and Founder Group Corp. Here, KWOK himself described his conduct pattern for destroying others through intentional infliction of emotional distress.

104. Mr. Zhang Hongwei, president of Orient Group Co., LTD., is a well-known Chinese businessman with estimated wealth over 10 billion USD. In 2009, China Minzu Securities planned to issue additional stocks to its top 10 shareholders. As Zhang Hongwei was the second largest shareholder of China Minzu Securities and thus had the privilege right to purchase large amount of the additional stocks of China Minzu Securities with discounted prices. KWOK didn't have the privilege right to get the stocks. However, KWOK wanted Zhang Hongwei to surrender his privilege right to KWOK. Zhang Hongwei denied. Then KWOK asked Ma Jian and Zhang Yue to have Zhang Hongwei arrested and jailed in a hotel in Chengde for 4 days. During that time, Zhang Hongwei was threatened and tortured with various torture equipment, including the notorious "Tiger tool", until Zhang Hongwei accepted KWOK's deal: transfer 100 million RMB to KWOK's account, and surrender his privilege right for purchasing the stocks of China Minzu Securities to KWOK. That deal made Zhang Hongwei lost 2 billion RMB at least. Since then, KWOK became the second largest shareholder of China Minzu Securities, and China Minzu Securities became one of KWOK's most profitable platforms.^{24 25 26}

105. In 2010, Mr. Zhang Zhizhong was the president of the Capital Airport Group Co., which

²⁴ <http://cj.sina.com.cn/article/detail/6261392091/343241?column=china&ch=9>

²⁵ <http://news.dwnews.com/china/news/2017-07-31/60004231.html>

²⁶ <http://www.aboluowang.com/2016/0417/724917.html>

held 61.25% share of China Minzu Securities' stocks, while KWOK's Beijing Zhengquan Holdings Co. Ltd. held share of China Minzu Securities' stocks. Starting from 2010, KWOK started to purchase all shares of China Minzu Securities' stocks that held by Capital Airport Group Co., and with very low prices. KWOK bribed some of the board members of Capital Airport Group Co., and made them agreed to transfer the stocks to KWOK. However, Zhang Zhizhong vetoed the deal. With the helps Ma Jian and MSS, KWOK made Zhang Zhizhong arrested in May, 2010, and later was sentenced to 12 years in prison. Then, KWOK got 61.25% shares of Capital Airport Group's stocks, which valued at 1.6 billion RMB. However, KWOK didn't pay cash as requested in the original contract, he simply let the Capital Airport Group Co. to use his Pangu Plaza as offices. That is a completely robbing! ^{27 28}

106. With the MSS as backup forces, KWOK had tried to bribe some world class politicians or businessmen. Some Chinese media reported that KWOK frequently bribed Tony Blair by providing private plane for traveling, sexual services, luxury gifts, etc.. Tony Blair, the Ex-Prime Minister of Britain, had been served as the UN Special Envoy for Middle East issue from June 2007 to May 2015. In August 2009, KWOK purchased 5000 books titled "Speaking for Myself", which was authored by Blair's wife Cherie Blair, while that book was only sold 300 copies in Britain for the same time period.

107. On **September 30, 2017**, a video was published on YouTube, as shown in **Exhibit V-14**, wherein KWOK instructs his aids to arrange flights services for Blair. Wang Yanping, KWOK's secretary, stated that she arranged two girls to accompany Blair to shop 5 pair of suits and 7 ties. KWOK allowed Blair to use KWOK's private jet to travel around the world, and every time KWOK always arrange Blair's favorite women, including Hedy and Yu Yong, to accompany and serve for Blair in the jet. KWOK had taped all Blair activities while he traveled with KWOK's private jets, and intimidated Blair to serve as an agent for KWOK's business. KWOK stated that his flight cost at least million USD for each travel. In 2013, Blair introduced Sheikh Mohammed

²⁷ <https://xw.qq.com/ipnone/m/lenjing/7ab6acc5bbf252028d5ffa1b92e6bebl.html>

²⁸ <http://www.caijingmobile.com/wxshare/211362.html>

bin Zayed al-Nahyan, the Crown Prince of Abu Dhabi, and then helped KWOK to get \$3 billion for ACA, an investment fund controlled by KWOK.^{29 30 31}

108. KWOK not only threatens Chinese businessmen or officials, but also threatens people from other countries. While working as a broker agent for UBS, Stephen had KWOK as one of his clients. In May, 2015, KWOK spent \$0.5 billion buying in Haitong stocks through Stephen. Two months later, KWOK lost almost all of the \$0.5 billion due to margin call. On **August 18, 2017**, a video was published on YouTube, as shown in **Exhibit V-15**³², wherein several phone conversations between KWOK and Stephen are recorded. In one of these phone conversations, KWOK claimed that it was UBS to trap him to have such a big loss. KWOK threatened to kill Stephen, his family members, and all the senior managers of UBS whoever involved in this trap. KWOK also stated that the actual investor behind him is the Chinese Communist, and the Chinese intelligence agency MSS had monitored all the transactions made by UBS. Stephen and managers of UBS would be arrested by MSS if UBS couldn't compensate KWOK's loss.

109. On **April 26, 2017**, a video was published on YouTube, as shown in **Exhibit V-16**,³³ wherein two of KWOK's ex-employees in Pangu Plaza disclosed how KWOK forced/instructed them to get 3.2 Billion RMB fraudulent loans through cheating.

110. On **June 9, 2017**, the Court in Dalian live-streamed the trials for the Pangu Plaza fraudulent case, as shown in **Exhibit V-17**³⁴, some of aids or ex-employees of KWOK's described details about how KWOK applied 3.2 Billion loans from Agriculture Bank of China ("ABC"), but with all faked documents, including faked contract, forged official seals, faked corporate earnings reports, faked tax reports for four years, etc.. The loan was supposed to be used for a construction project. However, KWOK transferred all the loans to Hong Kong and used for his personal usage, such as buying his private jets, luxury houses. Later on, KWOK ordered his employees to destroy

²⁹ <https://www.caixinglobal.com/2017-07-25/101122045.html?sourceEntityId=101121857>

³⁰ <http://www.aboluowang.com/2017/0820/980769.html>

³¹ <https://www.smh.com.au/world/tony-blair-linked-to-chinas-most-wanted-maralago-member-guo-wengui-20170525-gwd3rk.html>

³² <https://youtu.be/VnrNEMyXWtQ> (11:16-13:51)

³³ <https://youtu.be/Q4nwiiOu4OM> (1:41-2:40)

³⁴ <https://youtu.be/Fy3ZvwDAfiQ?t=1015> (16:57-33:17)

all the relevant documents. KWOK and his company Pangu Plaza was sued and trialed for the above mentioned cases in Dalian Civil Court in June and November of 2017 separately.

111. The above mentioned cases are just a short list of KWOK's victims.

112. Some of the above mentioned victims have filed lawsuit against KWOK, for example Ma Rui filed lawsuit against KWOK for raping to the Supreme Court of The State of New York³⁵.

113. KWOK was listed as most wanted by Interpol.³⁶

114. In summary, KWOK, backed by MSS and other Chinese intelligent agencies, accumulated over 100 billion USD simply through robbing, looting, cheating, stalking, threaten, destroying other people. KWOK worked and made money for Chinese intelligent agencies, and KWOK's money are mainly used by the intelligent agencies as funds for spying on and persecuting other people. KWOK's organizations and companies are simply gangsters backed by military and intelligent agencies. KWOK is a well-trained Chinese spy. Except spy and military skills, KWOK doesn't have any skills in finance/business/construction which he claimed he had. KWOK, with his spy skills and backed by some Chinese spy agencies, is a big threat not only to people inside China, but also to people outside China.

KWOK Continued to do Espionages For Chinese Government after Escaped to USA

115. Xi Jinping has become top leader of China since 2012. In order to ensure his power and justifiability, Xi, with the help of Wang Qishan, the Secretary of the Central Commission for Discipline Inspection of the CCP, started the so called anti-corruption campaign right after they took over the power of the CCP in 2012. In fact, the goal of the anti-corruption campaign is simply to comb out his political opponents, especially the spy agencies, including the MSS led by Ma Jian, the GHID led by Gen. Guo Boxiong and Gen. Xu Caihou, and other Chinese intelligent agencies which were loyal to the ex-President Jiang Zemin and ex-Vice-President Zeng Qinghong. So, by **January 2015**, Ma Jian, Guo Boxiong, Xu Caihou, and some other top leaders of the Chinese spy agencies were dismissed or even arrested due to corruption. Right before Ma Jian

³⁵ New York Court Case Index No. 158140/2017

³⁶ <http://www.globaltimes.cn/content/1043270.shtml>

was arrested, Ma Jian warned KWOK about the risk to be arrested, and KWOK escaped to other countries to avoid being arrested.

116. After hiding in other countries for a while, KWOK realized that the best way for him to be pardoned by Xi Jinping was to surrender and show loyalty to Xi. KWOK repeatedly expressed his loyalty to Xi Jinping and to the CCP. KWOK even frequently proposed how to use his talents and spy resources to continue to work for Xi Jinping and the CCP.

117. KWOK frequently sent letters to Xi Jinping to beg for forgiveness and to ask for new tasks that could allow him to apply his personal skills and strengths, especially spying on other Chinese dissidents. In the **August 31, 2017** live-streamed YouTube interview with Chen Xiaoping, as shown in **Exhibit V-18**,³⁷ KWOK displayed one of his letter to Xi Jinping dated on August 26th, 2017, wherein KWOK stated that “6. *Can you please let the Team of Special Case change hostility against me, and change the goal from arresting/destroying KWOK to have KWOK under your fully control and to utilize KWOK to serve for China and for Chairman Xi Jinping?* 7. *Can you please put the China's State interests and Chairman Xi's international strategies at the highest priority, so that to give KWOK a definitive goal and task, let KWOK devote to China, and let the activity results to show his loyalty to Xi and his love to China, while wearing a crime?*” Here, KWOK asked for Xi Jinping's forgiveness, and asked Xi Jinping to assign him more tasks, especially that could allow him to apply his spying talents and skills, his resources, and his money, to help the CCP to eliminate all the Chinese dissidents inside as well as outside China.

118. On **April 29, 2017**, a video was published on YouTube, as shown in **Exhibit V-19**³⁸, wherein a phone conversation between KWOK and one of his friends recorded on **March 5, 2017**, wherein KWOK stated that he was willing to help the CCP to destroy some of the Chinese dissidents, and was willing to have another NFCM for the Chinese government.

119. KWOK not only expressed his willing to continue his spy activities to serve for Chinese government, but also actually started to do it.

³⁷ <https://youtu.be/Mo3-1YvQBt4?t=266> (4:17–5:12)

³⁸ <https://youtu.be/whKwuLpKbUQ> (0:00–3:01)

120. In the **April 19, 2017** live-streamed VOA interview with Gong Xiaoxia and Dongfang, as shown in **Exhibit V-20**³⁹ and **Exhibit V-21**⁴⁰, wherein KWOK disclosed a tape which shows phone conversation between KWOK and Fu Zhenghua, the Deputy Minister of Chinese Ministry of Public Security at that time. Fu Zhenghua gave orders and instructions to KWOK to do espionage for Xi Jinping, such as investigating Wang Qishan's and Meng Jianzhu's wealth in the United States. KWOK confessed that he spent a lot of money to collect the requested information.

121. Mr. Ling Jihua used to be one of the top leaders of China and used to be backstage supporter of KWOK. Ling Jihua was arrested and sentenced to life in prison in 2014. To avoid being arrested, Mr. Ling Wancheng, the younger brother of Ling Jihua, escaped to USA in **March, 2015**. It was reported that Ling Wancheng might have some sensitive documents that could damage the CCP, so Ling Wancheng became one of the most wanted of the Chinese government. KWOK got orders from the Chinese spy agencies to monitor/espionage on Ling Wancheng.

122. On **August 29, 2017**, a video was published on YouTube, as shown in **Exhibit V-22**,⁴¹ which shows that KWOK hired T&M Protection Resources to monitor/investigate Ling Wancheng. T&M monitored Ling Wancheng for 3 months and provided some of the "investigation status reports and videos" to KWOK. KWOK provided these reports, including the video with Ling Wancheng's daily activities recorded on **March 29, 2017**, to China's security agencies. KWOK also sold some of the T&M reports to other news media for exchange of money or other services.

123. In **January, 2015**, Yu Yong, an assistant of KWOK, sent several emails using email account xiaopingguo@email.com to Mr. Parker's email account maparker@inddps.com to request surveillance services against Ling Wancheng and some other Chinese in USA, as shown in **Exhibit V-23**.

124. Mr. Parker's contact information can be found on the web⁴² ⁴³, wherein shows email

³⁹ https://youtu.be/C_N5IHj0Fy8 (1:08:31–1:11:03)

⁴⁰ <https://youtu.be/q0vLsK8eM7g> (2:05–5:45)

⁴¹ <https://youtu.be/UCCOa-aY0MQ> (3:34–4:40)

⁴² <http://securitydriver.com/01/matt-parker-and-independent-security-advisors/>

⁴³ <https://www.eptaining.us/about-us/>

address as mparker@inddps.com and phone 315-486-7854, with the Training Division of Independent Security Advisers.

125. Also as shown in **Exhibit V-23**, Yu Yong paid \$5,000 to Mr. Parker as upfront fund for surveillance on Ling Wancheng, Ling's family members, and friends, including his daughter LING HU JING YI, his wife Li Ping, his ex-wife Wang Yun Lei (王云蕾), Li Shu Hai, Ma Kai, etc. In her emails, Yu Yong provided detailed information of the above mentioned people to be on surveillance, including passport ID, date of birth, phone number, address, etc.

To retaliate/destroy SINO, KWOK initiated Cyber-attacks against Boxun

126. SINO has known nothing about KWOK until two of KWOK's victims, Zheng Jiefu and Xie Jiansheng, approached SINO in **November of 2014**. Both Zheng Jiefu and Xie Jiansheng were robbed by KWOK with helps of MSS. To avoid being further persecuted, Zheng Jiefu escaped to Australia, and Xie Jiansheng escaped to Canada.

127. Zheng Jiefu and Xie Jiansheng first approached SINO through phone then traveled to New York to be interviewed by SINO. They told their stories with solid evidences to SINO about how they were robbed and persecuted by KWOK with helps of Ma Jian and Zhang Yue.

128. Starting from **December 7, 2015**, SINO posted some articles about KWOK, as shown in **Exhibit V-24**^{44 45 46 47 48 49}. These articles are simply regular revelations about human rights violations that happened in China, which is listed in the mission of Boxun.

129. KWOK was very upset that these facts about him had been publicly revealed.

130. As a result, KWOK embarked on a full-throated campaign to discredit SINO and Boxun using threats, intimidation and defamation. KWOK started to target at SINO. Since then SINO started his nightmares and became another victim of KWOK.

131. As discussed in detail below, on multiple occasions, KWOK took to Twitter, YouTube,

⁴⁴ <https://www.boxun.com/news/gb/china/2014/12/201412071344.shtml>

⁴⁵ <https://www.boxun.com/news/gb/china/2014/12/201412102320.shtml>

⁴⁶ <https://www.boxun.com/news/gb/china/2014/12/201412172139.shtml>

⁴⁷ <https://www.boxun.com/news/gb/china/2014/12/201412172251.shtml>

⁴⁸ <https://www.boxun.com/news/gb/china/2014/12/201412190842.shtml>

⁴⁹ <https://www.boxun.com/news/gb/china/2014/12/201412291035.shtml>

and his own media GUO.MEDIA, and publicly made outrageous and utterly baseless assertions against SINO with the sole intent of undermining SINO's professional and personal integrity, and to discredit SINO's journalistic independence and integrity.

132. Since **December 10, 2014**, KWOK and his assistants have contacted with Boxun repeatedly and asked Boxun to delete those postings, and requested Boxun to report KWOK's statements or articles. Boxun responded that Boxun was an independent news platform and would be happy to let KWOK tell his side stories. For example, on **December 25, 2014**, Boxun published KWOK's statements regarding his disputes with Fangzheng, as shown in **Exhibit V-25**.⁵⁰

133. In **April 2015**, SINO had several phone interviews with KWOK to let him tell his stories and opinions. These phone interviews are recorded and then posted on Boxun and YouTube, as shown in **Exhibit V-26**.^{51 52 53 54}

134. While Boxun allowed KWOK to have his stories posted on Boxun, KWOK was still unhappy. He started many ways to attack Boxun, including Cyber-Attacks against Boxun.com websites, and tried to delete some pages on Boxun website, especially the reports posted by SINO.

135. In January and February 2015, Wei Shi (founder of Boxun) received some emails from various informants, as shown in **Exhibit V-27**, wherein stated that it was "this businessman" (KWOK) who "*hired Mr. Parker and several American companies to disable the boxun.com website because a post about him was in a blog, authorized the creation of a mirror website with a link that would allow a computer specialist to take control of a person's computer to search it for information about this businessman (KWOK)*". It also stated that "*the businessman had a US investigation firm chasing IP addresses in New York because of stories on your site*"; "*this businessman authorized a back attack on Boxun.com in 2012 and asked if your servers could be*

⁵⁰ <http://www.boxun.com/news/gb/china/2014/12/201412250043.shtml>

⁵¹ <http://boxun.com/news/gb/china/2015/04/201504061108.shtml>

⁵² <http://boxun.com/news/gb/china/2015/04/201504061158.shtml>

⁵³ <http://boxun.com/news/gb/china/2015/04/201504061301.shtml>

⁵⁴ <http://boxun.com/news/gb/china/2015/04/201504061420.shtml>

disabled” ; “This person (KWOK) claims to have someone within your organization who helps him to get the IP address and to delete these posts”; “How An Kwak (another alias of KWOK) and xiao pingguo (his executive assistant) that they have attempted to steal property, spread lies to discredit public officials in China, hired investigators to find and follow people in the United States and ordered the hacking of Chinese an US websites.”

136. In another email to Boxun, the informant stated that *“They are getting IP addresses from people posting messages on Boxun somehow. They hired expert to place a link on your site that would take control of anyone’s computer that used the link.”*

137. On **January 26, 2015**, the informant using the alias “The Truth” sent another email to Wei Shi, and stated that *“Mr. Kwak ordered attacks on two websites, <http://www.boxun.com> and <http://www.guba.com.cn/>. He continues today.”*

138. The informant also sent some copies of email-chains between KWOK’s executive assistant “xiao pingguo” and Mr. Parker, as shown in **Exhibit V-23**. The real name of “xiao pingguo” is Yu Yong. On **January 3, 2015**, Yu Yong sent an email to Mr. Parker with subject “Re:Re: website” to request Mr. Parker to do cyber-attack against boxun.com and guba.com, and Yu Yong clearly stated to *“disable or delete some pages”*.

139. On **February 15, 2015**, the informant sent an email to Boxun, wherein stated that *“This person’s assistant flew to New York this month (January 2015) and went shopping at Macys, at the same time lied to everyone about the work they wanted done and why. Now they have refused to pay them (Mr. Parker) after they would not attack both your Chinese and English sites.”*

140. On **January 5, 2015**, Yu Yong sent an email to Mr. Parker and asserted that *“We are going to there today, some of my other person is going to there as well.”* The informant with alias “The Truth” told Wei Shi that *“xiao pingguo(Yu Yong) led a team to come to the US from China after the Americans withdrew from the job. The businessman (KWOK) hired Chinese IT specialists to come the US to do the jobs originally assigned to Mr. Parker.”* The informant indicated that KWOK asked some Chinese IT specialists to do cyber-attacks against Boxun.com.

141. On **January 30, 2015**, Boxun.com published a news report titled as *“Former employee*

of China's spy agency behind cyber-attack on Boxun", as shown in **Exhibit V-28**,⁵⁵ wherein stated that *"Starting from Friday, Jan. 23, 2015, Boxun suffered its most severe cyber attack in several years. It included distributed denial of service (DDOS) and targeted the DNS server. The attack lasted until the morning of January 26, during which the main websites Boxun.com was not accessible."*

142. On February 7, 2015, Boxun.com published a news report titled as *"Chinese businessman tried to attack Boxun"*, also as shown in **Exhibit V-28**,⁵⁶ wherein stated that *"Boxun once revealed that Guo Wengui of Zheng Quan Securities fled China after learning he was under investigation. Guo came to the U.S. at the end of 2014 and then went to the United Kingdom. One week before Boxun suffered a major hack attack on Friday, Jan. 23, 2015, it had received a secret message saying that Ho Wan Kwak, a Hong Kong businessman, had since 2012 been trying to hire American companies to attack Boxun and conduct surveillance of the homes of persons in charge of Boxun. The message warned that Kwak was arranging a new round of attacks on Boxun and another mainland website known as guba.com.cn."*

143. At the same time, KWOK and his assistants repeatedly harassed/threatened Wei Shi and SINO and requested Boxun to delete all the postings about KWOK. In his live-streamed on YouTube broadcasting on May 9, 2017, as shown in **Exhibit V-29**⁵⁷, KWOK stated that he had requested to delete these postings when these articles published, and he repeated his requests again as *"you must delete those articles, apology publicly. Otherwise, Wei Shi and SINO will be sent to jail and will be striped in jail."*

144. In February, 2015, right after Boxun got evidences that it was KWOK who initiated cyber-attacks against Boxun, Wei Shi and SINO reported to FBI about KWOK's espionage and spying activities. That is another reason for KWOK to hate Boxun and SINO. KWOK started his campaign to destroy/retaliate SINO for reporting to FBI about KWOK's espionage activities. KWOK's retaliation against SINO is not only for KWOK himself, but also for the Chinese spy

⁵⁵ <http://en.boxun.com/2015/01/30/boxun-victim-of-serious-cyber-attack/>

⁵⁶ <http://en.boxun.com/2015/02/07/chinese-businessman-tried-to-attack-boxun/>

⁵⁷ <https://youtu.be/qUNteNSEwMA> (28:44-34:32)

agency. It was KWOK's job as a Chinese spy to espionage and to destroy Chinese dissidents, including SINO and LIU.

145. KWOK has not only tried to make Boxun.com disabled several times and placed virus links on Boxun.com through cyber-attacks, but also repeatedly defamed Boxun to scare people to view/visit Boxun.com. For example, On **December 23, 2017**, as shown in **Exhibit V-30**,⁵⁸ KWOK published a video recording of himself to his “郭文贵” YouTube account, wherein KWOK stated that “*whoever visit Boxun, your personal information would be stolen, and Boxun can automatically figure out whether you have any relationship with KWOK*”, “*Once our GUO.MEDIA starts to operate, I will show you how Boxun and Duowei take advantage of the highly developed software to collect your personnel information.*” KWOK has repeatedly and maliciously made such kind statements to scare people to visit or view Boxun.

146. The information provided by “The Truth”, as well as the emails between Yu Yong and Mr. Parker, are solid evidences which can prove that it is KWOK who planned and ordered the Cyber-attacks against Boxun in January 2015. KWOK initiated the attacks against Boxun just because he wants to retaliate SINO and Boxun for writing and publishing human rights violation activities committed by KWOK and the Chinese spy agency MSS. KWOK's extreme and outrageous actions, including cyber-attacks against Boxun to retaliate SINO through his agents/assistants, have caused SINO severe emotional distress and resulted SINO committed suicides several times, and have to be hospitalized repeatedly.

KWOK's Pattern: Lure/Cheat/Buy People with Big Awards

147. After escaped to USA, KWOK might have lost some of his spy resources and might not apply his pattern to destroy people with spy agencies as his backup forces. However, KWOK has developed a new pattern -- lure/cheat/buy people with big awards.

148. KWOK believes that money can make a ghost and his money would give him power to do whatever he wants to do. For example, in his live-streamed YouTube video on **February 8**,

⁵⁸ <https://youtu.be/OAq2aGC3MrQ> (14:30-15:48)

2018, as shown in **Exhibit V-31**⁵⁹, KWOK stated: *"The only power in the United States is the law. The law plus money, can destroy anyone. The law plus money and plus justice, it is invincible plus invincible. Ah, hey, we will see!"* Backed by his billions dollars and spy networks built by MSS, KWOK can destroy anyone through the unrestricted legal warfare.

149. Since March 2017, KWOK has repeatedly announced various type of Awards with huge amount money that would attract anyone who likes to make easy money. Here just list some of this type awards.

150. As shown in **Exhibit V-32**⁶⁰, on **March 15, 2017**, several Chinese forums or social media posted KWOK's awards for getting/stealing Li You's private medical reports, in which KWOK promised to give 10 million RMB (about \$1.6 million) to anyone who can provide him materials about Li You, especially Liu You's medical reports. In one of KWOK's announcements, he stated that he already paid someone 1 million RMB for what he already received.

151. As shown in **Exhibit V-33**⁶¹, in his **May 6, 2017** live-streamed video on YouTube, KWOK stated that *"My team has worked in Australia for over one year. We have collected DNA samples for dozens of people, and have medical certified with legal agencies. Have taped their home, financial transactions, and social networks, chatting with relevant parties, voice videos, communication evidences, DNA evidences, bank statements, etc., and thus can make it legal evidences in USA. Most of those people lived in Australia, that is why it is my main battlefield. I have spent over dozens of million dollars there just for investigation fee last year. Based on the judicial requirements, we have to add more evidences. I will pay \$100 million as award to buy case documents about Xiao Jianhua and any information about his case."* KWOK has paid millions of dollars to buy DNA samples, and promised to pay \$100 million to buy medical reports about Xiao Jianhua.

152. KWOK also started the so called unrestricted warfare campaign against some Chinese dissidents. KWOK has filed lawsuits against dozens of Chinese dissidents, including most of the

⁵⁹ <https://youtu.be/Y6o1fF1NXKY> (5:28-6:01)

⁶⁰ <https://www.bannedbook.org/bnews/cbnews/20170315/730869.html>

⁶¹ <https://youtu.be/RaA6DVaXFwg> (24:15--26:08)

people listed in 8-Weilei by him, and he repeatedly stated that he would file lawsuits against 91 Chinese dissidents soon or later. KWOK repeatedly threatened that he would make the 8-Weilei into prison and have them die in American prison.

153. As shown in **Exhibit V-34**⁶², in his **March 12, 2018** live-streamed video on GUO.MEDIA, KWOK stated that *"Recently I have received many documents and some of them have been paid. Thank you all very much. However, some people sent me USB but can't be opened, and some doesn't have solid evidences. All my comrades should remember that the documents I asked for should have legal and actual value, and in original formats, such as videos with clear pictures and official documents."*

154. In the **May 5, 2018** live-streamed interview with Lu De on YouTube, as shown in **Exhibit V-35**⁶³, wherein KWOK disclosed some of the phone recordings between KWOK and Chen Zhiyu during the time period from September to November in 2017. In those phone conversations KWOK promised to provide \$50 million to Chen Brothers and asked them to steal/create privacy information about some Chinese officials or individuals, including Yao Yaping, Shu Xiaoqin, Wu Yaxiong, Fu Zhenghua, Fu Weihua, Sun Lijun, Meng Jianzhu, etc. KWOK particularly told Chen Zhiyu that *"I hope your specialist would do his best to get the documents, including secret documents about North Korea, which is helpful for US to know about North Korea issue. And any privacy information for Fu Zhenghua, Sun Lijun, Su Xiaoqin, Yao Yaping. These documents are very important."* and *"What I need you to do is getting private information about all members of the Standing Committee of CCP, including any sexual videos and family corruption information."* KWOK paid \$50 million to create/steal sexual videos about each of the top CCP officials so that he could threaten/extort them to serve for him, just like what he had done to Liu Zhihua, the ex-Deputy Mayor of Beijing.

155. Had he asked for, with \$50 million as award, KWOK could have bought sexual videos of anyone in this world, including President Trump's.

⁶² <https://youtu.be/fYJa4aJz63s> (0:00 - 1:00)

⁶³ <https://youtu.be/qnaeyA2KXdw?t=141> (2:21 - 1:00)

156. In the **May 5, 2018** live-streamed interview with Lu De on YouTube, as shown in **Exhibit V-36**⁶⁴, wherein KWOK stated that *"The driver of Li You, his Twitter account id is "打铁还需自身硬". Another guy who provided court documents to me was arrested in Hong Kong. I provided large amount money to all these people. I gave \$20 million to Ge Changgen who used to work for "China TV". You can see that I have provided a lot of money to them. They were all arrested."* KWOK tried to convince people that he would pay \$20 million to those who could create secret documents, or just do what he asked to do, such as to defame/harass/assault Plaintiff.

157. All these awards announced by KWOK are extremely attractive to those Chinese who want to make easy and big money, especially to those who can access the medical reporting system or court reporting systems. One document can exchange for million dollars! It is so attractive such that some Chinese even tried to provide faked reports to KWOK to get the award. It is more attractive than the most attractive lotteries such as Mega Millions, because any lottery ticket has a cost, while KWOK's award doesn't have any cost. What people need to do is simply accuse the people KWOK targeted at or provide some documents whether true or faked, and KWOK promised to cover all the costs. KWOK also repeatedly claimed that his award was legal and certified by government agencies. It is understandable that millions of Chinese are so anxious to be fans of KWOK and have tried to help him to accuse those who were targeted by KWOK.

KWOK Cheated/Lured People to Fight against Interpol for Him

158. On **March 19, 2017**, Interpol listed KWOK as most wanted, while KWOK was live-streamed interviewing with VOA. KWOK immediately announced he would spent \$1 billion to fight against Interpol to get rid of his name from the list.

159. Lured by the \$1 billion awards, many people, including some well-known Chinese dissidents, have tried their best to help KWOK to fight against Interpol.

160. Lured by KWOK's \$1 billion awards, Yang Jianli, a well-known Chinese dissident, has started a lobby campaign for KWOK, such as collecting million signatures on a petition letter to appeal White House to give asylum to KWOK, and visiting/lobbying Interpol

⁶⁴ <https://youtu.be/xYnNu0TL-xs> (9:30--10:10)

headquarter to have KWOK's name removed from the most wanted list, etc., as shown in **Exhibit V-37**⁶⁵.

161. A phone conversation between KWOK and Yang Jianli exposed that KWOK had sponsored Yang Jianli to do such kind lobbies. As shown in **Exhibit V-38**⁶⁶, KWOK advised Yang Jianli through phone and stated that *"Besides, in terms of White House, many people in mainland China has been harassed. I think we should cancel it, Jianli Brother. We should cancel it. Thank you. Who will be our scapegoat? Let hacker take the responsibility for it. You must another news story to accuse hacker harassment, police harassment. Just tell people that it was Chinese police who harassed netizens. This is important issue. We should take advantage of this opportunity. Then we express our thanks and have this finished. Next time you must provide well-designed plan, expense, and team budget. We should make it a world-class story."* This conversation shows that it was KWOK and Yang Jianli who started and manipulated the White House petition letter signature, and KWOK had sponsored Yang Jianli to do lobbies and to fight against Interpol.

162. KWOK had told some of his friends, including Guo Baosheng, that he had sent Wei Jingsheng \$150K in **June 2017** to protest Interpol and tried to remove KWOK's name from the Interpol's most wanted list.

163. As shown in **Exhibit V-39**⁶⁷, Wei Jingsheng, along with Huang Ciping, Zhang Jian and some other Chinese dissidents have visited Interpol headquarters several times to protest Interpol for listing KWOK as most wanted. In a conference held in July 2017, Wei Jingsheng stated that *"Some friends may not understand our recent activities that we just gave a lesson to Interpol. Once we went to there to meet them, the Interpol had to do some compromise. For example, regarding KWOK, only the Chinese branch of the Interpol announced it, but the its headquarter didn't. Thus it sounds like illegal to list KWOK on the most wanted list."* KWOK repeatedly expressed his thanks to Wei Jingsheng and would pay award to these people who had protest against Interpol.

⁶⁵ <https://petitions.whitehouse.gov/petition/help-and-protect-chinese-whistle-blower-and-exile-guo-wen-gui>

⁶⁶ <https://youtu.be/cpSBH7mx57A?t=28> (0:28 – 23:20)

⁶⁷ <https://youtu.be/E-qQfXS-FV0?t=15> (8:15 – 23:20)

164. Upon information and belief, Wei Jingshen had done similar things for other billionaires, including Lai Changxing and Zhang Hongbao, and got paid roughly about million dollars!

165. As shown in **Exhibit V-40**⁶⁸, KWOK has sponsored/cheated many people to go to Interpol headquarters to protest against Interpol for listing KWOK as most wanted.

166. Sponsored by KWOK, Yang Jianli had successfully convinced some Congress Members and Senators to speak out for KWOK. On or about November 3, 2017, as shown in **Exhibit V-41**⁶⁹, Congressman Rubio stated at a congress hearing that *"KWOK is a whistle blower and criticizer of the Chinese government. His Facebook account was blocked and Facebook informed him publicly that he violated certain terms that he published personal identifies information about individuals and that violated the certain terms, and so and so. My question is, I want to be clear is there any pressure from the Chinese government?"*

167. Rubio knew that it was KWOK who had published personal identity information on Facebook. But he defended for KWOK and accuses Facebook for blocking KWOK's account. That tells how powerful KWOK is. He can have many big figures to speak out for him.

KWOK Cheated/Paid Song Jun to Steal Sensitive Documents

168. KWOK had cheated/paid many people to steal sensitive documents for him, including private medical reports, court documents, passport and other identification documents, etc. Song Jun is one of such kind person who was paid to steal sensitive documents for KWOK.

169. Song Jun used to be an employee for Civil Aviation Administration of China Air Traffic Control Bureau, and thus can access passenger's booking system and can get identity information of the passenger's.

170. In **June 2017**, Song Jun was arrested by Chinese police for stealing/disclosing sensitive documents.⁷⁰

171. In **July 2017**, during the trial against Song Jun, a phone conversation video between KWOK and Song Jun was used as evidences to show that it was KWOK who lured/cheated/paid

⁶⁸ <https://www.rfa.org/cantonese/features/hottopic/interpol-07122017064729.html>

⁶⁹ <https://youtu.be/aWwWxXHd7Zk?t=8> (0:08 – 1:20)

⁷⁰ http://www.xinhuanet.com/world/2017-07/10/c_1121290100.htm

Song Jun to steal sensitive documents for KWOK, as shown in **Exhibit V-42**⁷¹, wherein KWOK told Song Jun that *"This card is one of the most awesome cards in the world. Only when you have over billing dollars, you can get a black credit card. This kind of card has no limited abroad, meaning no consumer spending limit. You can even to buy a jet with it. Few can get this kind of credit card with which one can easily buy a plane. This card is needed when you buy something especially abroad. Ah, you know it is not safe having cash with you. Okay, buddy! It is just getting started. Sorrow and pleasure, money and woman, power and art, then I call it perfect. Still yet to see, my brother. So be it, I feel at ease having this card with me ,if needed ,good to have the card. You can do anything into Dubai ,I will give you what you want even the whole building. I'm going to apply UK passports for you and your wife t. What do you think of this? Do you qualify the requirements? It will take me three to five months to get you the passport. I have a good share for you to buy, it is just between you and me. You can invest about ten million and you will double it soon. In case you lost, I will compensate it for you. You can earn the money and buy houses. Okay? Believe me. Find a financial agent, and create an account. Then you buy the stock as soon as I tell you. After six months or within a year or maybe eight months you will double your money. Understood? Give him some money as reward if necessary. I will have someone to carry you some cash if needed."*

172. In another phone conversation, as shown in **Exhibit V-43**⁷², wherein KWOK told Song Jun that *"Please send me the flight records of the Boeing 787, the more detailed the better!" "I need the passport photos of those people, the more clear the better." "Record the video of 787 plane and the planes of Hainan Airlines with tail number. Send me once you get it."*

173. As shown in **Exhibit V-44**⁷³ and **Exhibit V-45**⁷⁴, wherein KWOK told Song Jun that *"The VVIP is UAE's vice premier who is equal to the director general of general office of the CPC central committee, is invited by the country to come to Beijing by 650 UAE King's aircraft."*

⁷¹ <https://youtu.be/u6iyd4rKH7o> (0:04 – 2:19)

⁷² <https://youtu.be/-cas67ZkgBM> (0:04 – 2:19)

⁷³ <https://youtu.be/Ntah87NGF7w> (0:04 – 3:12)

⁷⁴ <http://video.chinanews.com/flv/2017/0710/wangyi06.mp4> (0:31 – 2:10)

He has three identities; the first one is the chairman of Sovereign wealth found, which means he is the religious leader of UAE. He is also the chairman of their administrative committee the counterpart of our director general of the general office of the CPC central committee. Meanwhile he is a member of a Royal family enjoying the vice president treatment. Buddy , would you please find out all his flight to China and all his international flights? Do it for me please, I just want to know the information of where it goes, who's on the plane, something like that, all of it please. BUDDY, when the VIPs arrive, they will stay for an hour than the leaders will come to meet them. Let me know when and where they meet, and who and how long they meet. Please pay attention that if there is any airplane of UAE foreign ministry arriving there from 25 five to 30, if yes, please tell me immediately. United states secretary of state John Carey will arrive in Paris and he wants to meet me tonight. Maybe he is willing to talk something about the issue of the south China sea and THAAD missile .There are hot topics in China now. And Mr. and Ms. Clinton invite me to his native place, little rock, I will fly there to meet him, what do you think. You need to give me a summary of the following problems, who has the best plane among the foreign government stuff, who has the highest quality? Who has a best relationship with China government, especially the prince of Saudi Arabia came here recently. And I want to know about his plane and plane team, does he have any jokes? I really care about this .Is he going well with his flight, talk to me something about it, how many people keep company with him. The prince of Saudi Arabia visited to Beijing on August 28th 2016 and flew to Japan and back to Hangzhou. I need to get the information about the itinerary, such as the plane's model and the number of the persons and how many people accompanying him. Can you find out the passenger named WA LI on this flight today or tomorrow ,and check ,his a record check his inbound and outbound record of mainland China as soon as possible.”

174. KWOK particularly asked Song Jun and Ma Cong to monitor on some VVIPs, including Mr. and Ms. Clinton, State Secretary John Kerry, The Prince of Saudi Arabia, etc. KWOK has monitored some of the big figures and looking for opportunities to bribe/extort them! KWOK can monitor those VVIPs, and then it is easy for him to monitor normal people including Plaintiff.

175. Upon information and belief⁷⁵, from **December 2015 to March 2017**, per Song Jun's requests, Ma Cong retrieved some sensitive passenger's information, including traveling date, starting and ending airports, model, end tail number, about 146 passengers and 561 items traveling information, provided to Song Jun. Then Song Jun sent it to KWOK's assistant, Wang Yanping. Through Ma Cong and Song Jun, KWOK got many traveler's privacy information, including passport and their private conversations, and KWOK had repeatedly disclosed some of the sensitive information through his social media accounts.

176. What KWOK asked Song Jun and Ma Cong to do are absolutely criminal activities and violated basic ethic rules. However, KWOK always claimed that his activities were legal and fight for pro-democracy movement in China, and many people are buying it and believed he was a whistle blower.

177. KWOK first lured Song Jun with an Black Credit Card which can even purchase a private jet, and then asked Song Jun to take advantage of his job to steal traveler's identification documents and other sensitive information. This example shows that KWOK had solicited people to do criminal activities for him. That is KWOK's new conduct pattern after he escaped to USA – with big award to buy/lure/solicit/incite people to do criminal activities for him!

KWOK Cheated/Lured People to Forge/Steal Secret Documents

178. Chen Zhiyu and Chen Zhiheng are twin brothers and residents of Canada. However, they were lured by KWOK's big awards and tried to create/forged/steal sensitive documents for KWOK.

179. On **April 23, 2018**, Chinese police in Chongqing hold news conference and announced that Chen Zhiyu and Chen Zhiheng had committed forged documents and KWOK sponsored them to do that. The news conference released some evidences, including phone conversations between KWOK and Chen Zhiyu and the documents that were sent to KWOK, as shown in **Exhibit V-46**⁷⁶, the phone conversation recordings can show that it was KWOK who asked Chen

⁷⁵ <http://www.chinanews.com/m/gn/2017/07-10/8273166.shtml>

⁷⁶ <http://m.news.cctv.com/2018/04/23/ARTIKcix1bR1mlpYS2coaxyL180423.shtml>

brothers to steal/forge/create these CCP documents, and KWOK paid \$4,000 monthly to Chen brothers for providing/creating these documents to him.

180. KWOK immediately accused the news conference in Chongqing to be a persecution against him and the Chen brothers. KWOK argued that the phone recordings had been edited and he claimed that he just released his full version of the phone recordings, as shown in **Exhibit V-47**⁷⁷. Although KWOK claimed his phone recordings was absolutely full version without any editing, the key point about \$4,000 salary to Chen's brother were erased from his full released version. KWOK lied about that his phone recordings.

181. On **April 24, 2018**, KWOK published a video recording of himself to his “郭文贵” account on YouTube, as shown in **Exhibit V-48**⁷⁸, wherein KWOK stated that *“I don't have any business relationship with Chen brothers. At the first beginning when I know them, I wanted to give them money but they refused. Later, they wanted to do this business full time, including investigating those Chinese State Thieves, I proposed to pay them \$4000 monthly. Actually, I paid them 6000 to 8000 monthly. Out of all my documents in my hand, only 0.1 percentage are from them. He was fished to go to Singapore. I strongly opposed him to go there. Our last communication through phone is around February 15. I told him not to go and he would be arrested if went there. But he insisted to go. Finally, he was kidnapped. Why did he insist to go there? He was there to trade for all the case documents about Xiao Jianhua, all the case documents. That is why he was arrested. He said he had given me about 30 secret documents, but I forgot. I only used two of his documents, all others hadn't used yet.”*

182. KWOK alleged that he had no business relationship with Chen's brother, and then confirmed that he had done business with them and paid them \$6000 to \$8000 monthly to exchange for secret documents. KWOK always fool people like that.

183. Although there are differences between the two versions of phone recordings released by KWOK and by Chongqing's news conference, both KWOK and Chongqing agreed on the

⁷⁷ https://youtu.be/Qum-iMXw_Nc?t=70 (1:10 - 3:26)

⁷⁸ <https://youtu.be/evMMXX-34DM?t=419> (6:59 - 8:11)

following facts: (1) KWOK really paid money to ask Chen brothers to get the secret documents; (2) KWOK received at least 3 secret documents from Chen brothers; (3) KWOK had circulated these 3 documents through Bill Gertz and published on freebeacon.com or washintongpost.com. These 3 facts show that KWOK had done businesses not only with Chen brothers, but also with Bill Gertz!

184. In fact, KWOK told more about his business with Chen brothers. Based on KWOK's phone recordings, Chen Zhiyu went to Hong Kong to get case documents about Xiao Jianhua, which KWOK had repeatedly announced \$0.1 billion award for. That tells KWOK and Chen had planned to do \$0.1 billion business – \$0.1 billion to buy Xiao Jianhua's case documents. Chen brothers just simply lured by KWOK's big award to steal some secret/private documents.

185. On **April 24, 2018**, KWOK published his statements, as shown in **Exhibit V-49**⁷⁹, wherein KWOK stated that *"I have provided a great deal of documents in my possession to the U.S. law enforcement. Some of which I released have been authenticated by the US authorities. As to the contents of my whistle blowing, I take legal responsibility for their truthfulness."* KWOK's statements is equivalent to say that if he paid a thief to steal an art piece from the Metropolitan Museum, he would be considered as hero rather than guilty, as long as he can prove the art piece was not faked but really created by Van Gogh. KWOK's logic is absolutely robber's logic.

186. KWOK's activities are vicious and malicious and unforgivable not because he had disclosed something true, but because he maliciously bought people to steal something not belonging to him, and disclosed very sensitive information about individuals or organizations. If KWOK's activities are not guilty, then he would buy people to steal sensitive documents of US army or medical information of American citizens and then disclose all these privacy information on internet. Then, there would have no privacy for anyone in any country.

187. In **April 19, 2018** live-streamed interview with Lu De on YouTube, as shown in **Exhibit V-50**⁸⁰, wherein KWOK posted sensitive privacy information, including passports information of

⁷⁹ https://youtu.be/x8ruP_lclcw (6:59 - 8:11)

⁸⁰ <https://youtu.be/8ygmVvWhzVs?t=1027> (17:07-18:37)

Wu Xiaohui, Zhuo Ran, Wang Xiaolan, who are all relatives of Deng Xiaoping. This is the recent activities that KWOK disclosed privacy information of individuals. Previously, KWOK had disclosed many privacy information, including identity documents, bank accounts, medical reports, etc. KWOK had confessed that some of these documents were bought from Song Jun.

188. In April 19, 2018 live-streamed interview with Lu De on YouTube, as shown in **Exhibit V-51**⁸¹, wherein KWOK posted sensitive privacy information, including a private email sent from Elliott Broidy<Elliott@Broidy-Capital.com> to <rbroidy@gmail.com>. Elliot Broidy is one of President Trump's top fund-raiser.⁸² KWOK didn't tell how he got those very sensitive emails. However, he used to solicit hackers to do cyber-attack against Boxun.com, KWOK probably got these emails through cyber-attacks.

189. On May 9, 2018, KWOK disclosed 144 pages of sensitive emails on GUO.MEDIA, as shown in **Exhibit V-51**⁸³, which includes not only individual passport information, but also some sensitive information regarding US government security issues. The file mainly lists some selected emails obtained through hackers and most of the emails are relevant to President Trump and his top fund-raiser Elliot Broidy. By disclosing these emails, KWOK wants to tell people that President Trump had been BGYed by CCP and was trying to deport KWOK. Obviously, KWOK was targeting at President Trump.

190. One of the emails disclosed by KWOK contained an email sent to Jeff Sessions, the US General Attorney, wherein listed 19 lawsuits against KWOK with charges including but not limited to *kidnapping, false imprisonment, assault, conspiracy, extortion of signature, destruction of evidence, wire fraud, money laundering, forgery, fraud, blatant violation of foreign exchange laws, falsifying documents, providing false documents to obtain loans, Falsifying and fabricating evidence, tampering with evidence, bribery, Fraud, Money Laundering Conspiracy, Falsifying Documents, Providing False Documents to Obtain Loans, Conspiracy, Fraud, Falsifying and*

⁸¹ <https://youtu.be/vN3-TBDEEE?t=479>

⁸² <https://www.bloomberg.com/news/articles/2018-03-26/trump-fund-raiser-broidy-sues-qatar-over-cyber-attacks-leaks>

⁸³ https://content.guo.media/uploads/videos/2018/05/guomedia_ffcee90b044d615c2f0b963292c60b0f.pdf

Fabricating Evidence, Tampering with Evidence, Bribery, etc., as shown in **Exhibit V-51**⁸⁴.

KWOK Recruited Many Accomplices to Do Criminal Activities for Him

191. KWOK had repeatedly alleged that he paid to someone to do something, and some people also frequently confessed that they had been paid by KWOK for doing something. Here are some examples of such statements or evidences.

192. In the **April 26, 2018** live-streamed video, as shown in **Exhibit V-52**⁸⁵, wherein KWOK stated that *"You all have viewed the Chen brothers. I have created a bank account and deposited \$50 million for them. Why did I give them \$50 million? Why? You can take a look at the documents that Chinese government disclosed, for those who provided documents to me and requested money, I always give them money as I promised, in most of the cases I gave them much more than I promised. I had never broken my promises and I had never owe money to anyone who had provided tips or information to me. That is KWOK. You will see that how much money I have spent on buying documents just in previous year. Those Weilei, and those dissidents, you stand up and tell the truth, had I given you money? This issue is very interesting and has attracted attention to western media. I will disclose detail in the near future."*

193. Here KWOK confirmed that he paid \$50 million to Chen brothers to steal secret CCP documents and court documents of Xiao Jianhua's. He also claimed that he had never broken his promise, which means he had paid for all the sensitive information he received. He also confessed that he had paid lot of money to some dissidents for helping him to do what he asked for, such as protest against Interpol, VOA, do lobbies, and to help him to harass other dissidents including plaintiff.

194. In the **July 15, 2017** live-streamed video, as shown in **Exhibit V-53**⁸⁶, wherein KWOK stated that *"There are too many internet users provided information to me, and I have paid a lot of money for those information. Even the driver of Li You cheated me 200,000 RMB. I gave it to him. I gave him once he delivered the documents to me. He disappeared once he received 200,000*

⁸⁴ https://content.guo.media/uploads/videos/2018/05/guomedia_ffcee90b044d615c2f0b963292c60b0f.pdf

⁸⁵ <https://youtu.be/2zVFzrfDknw> (3:51–5:40)

⁸⁶ <https://youtu.be/wiANR8JChNk> (1:04:55 – 2:19)

RMB. Of course he cheated me. But I don't regret for it. This afternoon, I gave \$70,000 to a Chinese in Japan. I sent \$120,000 to an Australian who had provided documents and help me to follow others. I have paid too much money. Many people would not have any feedback once received money, I even don't know who they are. A lot. You will see that I have paid to 50 or 60 people, but I even don't know their names. I don't remember their names. I know that most of people use alias. But I would never regret." KWOK confessed that he paid many people to steal privacy information for him, and he was so proud of doing that kind criminal activities.

195. KWOK not only buy people to steal sensitive documents for him, but also buy people to do demonstrations, protests against media, defame/harass/assault those targeted by KWOK, etc.

196. On **February 23, 2018**, as shown in **Exhibit V-54⁸⁷**, by posting an announcement through his GUO.MEDIA, KWOK let people know that he gave Wang Deli a/k/a Zhaoming (herein after "Zhaoming"), the head of the KWOK's Endorsement in Australia, one million USD for his personal expenses. Many KWOK's supporters reposted this message. KWOK stated that over billion Chinese have viewed his videos. Many people believed that they could make big money by doing whatever KWOK asked them to do. ^{88 89}

197. In the **May 6, 2018** live-streamed video, as shown in **Exhibit V-54⁹⁰**, Zhaoming stated that "Mr. KWOK has repeatedly expressed that he would spent all of his \$20 billion for his exposure revolution. He is serious. KWOK told me that he would give me \$10 million even \$100 million if \$1 million is not enough for me. This is KWOK's goodwill. Today, I tell you all that I already received it right after KWOK posted on Twitter, which said that he sent \$1 million to Zhaoming and to the KWOK's Endorsement of Australia. Right after I woke up, I found my bank account already got the money." Zhaoming confirmed that he had received \$1 million from KWOK.

198. In the **May 12, 2018** live-streamed interview with Lu De, as shown in **Exhibit V-54⁹¹**,

⁸⁷ <https://youtu.be/IUOdsDtWi08> (0:00–0:43)

⁸⁸ <https://www.trendsmap.com/twitter/tweet/966981997804642306>

⁸⁹ <https://www.trendsmap.com/twitter/tweet/966981361905971200>

⁹⁰ <https://www.pscp.tv/w/1PIKQXmgIAvxE> (37:03–37:36)

⁹¹ <https://youtu.be/wJHRnIJCQ7Q?t=79> (1:18–3:22)

Qiu Yueshou stated that *"Per requests from KWOK's team in Australia, I was involved in the financial related issues to monitor and management issues. Frankly speaking, I am not specialize in that area. I know nothing about the \$150K transactions. But I know that KWOK did sent \$1 million to us. However, due to my mistakes, we haven't received it yet. I can also confirm that the KWOK's Endorsement in Australia did receive \$100K from KWOK."* As one of the head of KWOK's Endorsement in Australia, Qiu Yueshou confirmed that he did received \$100K from KWOK, and KWOK also tried to send him \$1 million but hadn't received yet due to transaction errors.

199. On **February 27, 2018**, KWOK published a video recording of himself to his "郭文贵" account with GUO.MEDIA, as shown in **Exhibit V-55**⁹², wherein KWOK stated that there are about 28 people on daily basis responded to KWOK and wanted to work for him as full-time KWOK's Endorsement. Then Zhuang Liehong, the head of KWOK's Endorsement in North America, stated that he became a full time staff to work for KWOK's Endorsement, and he got paid \$4,500 monthly.

200. On **February 21, 2018**, KWOK posted a notice through his "郭文贵" account on GUO.MEDIA, as shown in **Exhibit V-56**⁹³, wherein KWOK stated that he paid \$170,000 to Xiang Lin, the head of KWOK's Endorsement in Japan, for buying a Mercedes car, which was dedicated to do Chariot Parade in Japan to promote KWOK's campaign to destroy people targeted by KWOK.⁹⁴

201. On **February 13, 2018**, Guo Baosheng published a video recording of himself to his "郭寶勝政論" YouTube account, as shown in **Exhibit V-57**⁹⁵, wherein Guo Baosheng stated that *"Now I can bravely tell everyone that I took Guo Wengui's money and of course took it. And I also took the six bottles of Maotai Alcohol he sent to me. Also got a lot of other benefits. Why? Because we are good friends and we are (his) good fighters!"* Guo Baosheng even purchased a

⁹² <https://www.youtube.com/watch?v=FGXE3Rsc0pA> (0:00–1:20)

⁹³ <https://youtu.be/rokBjYujdb0> (0:00–0:15)

⁹⁴ <https://www.guo.media/posts/70344>

⁹⁵ <https://youtu.be/IXfEW-JX0qg> (22:53–23:09)

house with KWOK's money.

202. In his **May 10, 2018** live-streamed video on GUO.MEDIA, as shown in **Exhibit V-57**⁹⁶, KWOK stated that *"I not only sent money to Guo Baosheng, but also sent money to a famous Chinese dissident, about \$150,000, and it caused 6 of my bank account frozen. About 7 or 8 bank accounts were frozen for sending money to Guo Baosheng. About 4 or 5 bank accounts were frozen for sending money to Australia. Several bank accounts were frozen for sending money to my supporters in Canada and Chen Brothers. At least 50 of my bank accounts were frozen. You all know that there are about dozens billions USD of my money were frozen. Is this donation? You guys only know to receive money from me, but never think about to pay tax, and never think about whether you are qualified for receiving donations. It will make you dead for receiving such kind money."* KWOK confirmed that he had sent money to Guo Baosheng many times, and he had billions of USD were frozen for sending money illegally.

203. In his **May 11, 2018** live-streamed video on GUO.MEDIA, as shown in **Exhibit V-57**⁹⁷, KWOK stated that *"I want to tell Guo Baosheng that our accounting department has sent you money through at least 9 transactions. Hope Baosheng could provide me receipts once you viewed this video. Otherwise, I will send you an attorney letter to ask for it. It is criminal activity if you don't provide receipt for the money I sent to you. Including Mr. Lai Jianping, you need contact us and provide us your receipts. As well as Tang Baiqiao, hope you can send me our receipts for my donations to you. Otherwise you will get my attorney letter too."* KWOK claimed that he had sent money to Guo Baosheng many times, and billions USD of his money were frozen due to sending money illegally.

204. In the **February 3, 2018** live-streamed video, as shown in **Exhibit V-58**⁹⁸, wherein KWOK stated that *"Look at this T-shirt with Rick Owens brand. It valued at \$3,700. This is a great design, very modern with our logo on it. Our fighter comrades will feel very comfortable with this type texture. It can be used for our movements, as well as for kitchen works, chatting,*

⁹⁶ <https://youtu.be/iLedUTIIU9g> (1:20:09-1:22:44)

⁹⁷ <https://youtu.be/2fQzpk-U2xQ?t=713> (11:53-12:36)

⁹⁸ <https://youtu.be/wzblHvEALFo> (1:10-3:30)

exercises. Extremely comfortable. I hope I can find the best way with the cheapest price to have all our fighters to wear this combat uniform." KWOK promised that each member of his organizations would get at least one of this T-shirt as combat uniform. KWOK also designed his own logo. KWOK stated that, with weapons in hand, and with combat suit on, fans of KWOK's would be the greatest warrior, and they can destroy anyone in this world. KWOK is luring people with a shirt valued at \$3700 to join his Twitter Party or Gun Party to be his accomplices.

205. On **May 1, 2018**, KWOK posted a notice through his "郭文贵" account on YouTube, as shown in **Exhibit V-59**⁹⁹, wherein KWOK stated that "*Tell you the truth frankly, my accountants just verified that there are 171 bank transactions to those people in one year. Many people received my money, including Guo Baosheng. Since the first time we met, I have never rejected Guo Baosheng's requests for money.*" Within less than a year, KWOK had 171 transactions to his accomplices, including Guo Baosheng.

KWOK Recruited Accomplices through Ponzi Scheme

206. KWOK not only used his money to buy people to do criminal activities for him, but also recruited accomplices through a Ponzi-like fraudulent scheme.

207. Yang Jian'ao is a key member of the KWOK's Endorsement in Canada. On **March 17, 2017**, Yang Jian'ao sent an email to KWOK, in which Yang asked for roughly about \$1 million CND from KWOK. As an exchange, Yang promised to do whatever KWOK would ask him to do. Since then, KWOK has paid some bills for Yang, and thus has made Yang Jian'ao a servile follower of KWOK, as shown in **Exhibit V-60**.

208. Since early April 2017, KWOK and Yang Jian'ao started to issue the so called Dry Stocks of Chinese Corrupt Official Property (DSCCOP). **Exhibit V-61** shows some of the contracts for selling DSCCOP to KWOK's endorsement, and some conversations or emails between Yang Jian'ao and the people who were cheated to buy the (DSCCOP). Yang Jian'ao stated that he had video tapes to prove that the DSCCOP plan was initiated and backed by KWOK, whereas Yang was just helping KWOK to do this financial investment. When asked how

⁹⁹ https://youtu.be/_fG6BjfnT6E?t=2238 (37:18--37:44)

to get the properties of Chinese corrupt officials, Yang said that KWOK had a plan to make Mr. Fu Zhenghua surrender all of his properties with estimated value over \$10 billion. When asked how to make a top Chinese officials to surrender his properties, Yang said that “*KWOK always had some methods to make other people arrested and tortured, they have to surrender.*” Based on the contract, Yang would get 0.1 billion RMB by selling one Chinese official’s property, and all other investors would get 125 times of their original investment amount. The DSCCOP plan is completely a fraudulence investment trap. However, there are many KWOK’s supporters became victims of this trap.

209. On **October 26, 2017**, KWOK published a video recording of himself to his “郭文贵” YouTube account, as shown in **Exhibit V-62¹⁰⁰**, wherein KWOK described his DSCCOP plan. His new plan would confiscate \$200 trillion of Corrupted Chinese officials’ properties. He also gave a sharing plan for those \$200 trillion assets: 50% of it would be shared by all members of the KWOK Fan Club, and the other 50% would be used and managed by KWOK’s Endorsement Association. That means, all the \$200 trillion will become KWOK’s or his supporters’.

Part 12. KWOK TARGETED AT PLIANTIFF AND OTHER CHINESE DISSIDENTS

KWOK Has Motivation to Destroy Chinese Dissidents

210. Since early 2017, KWOK has posted videos, or various posts through social media, including YouTube, Twitter, Facebook, and even created his own media, GUO.MEDIA. By posting these messages, KWOK tried his best to convince Xi Jinping and the CCP that he is very talented to do valuable espionage works for China, and it would be a win-win for both KWOK and Xi Jinping, if Xi Jinping forgave him and let him to work as a spy for China.

211. KWOK repeatedly alleged that Ma Jian had given him the contact list of secrete spy agents hiding in USA and other countries, and he had viewed the secrete profiles of most Chinese dissidents maintained by MSS. He knew who was Chinese spy, and who had weak points that could be taken advantage of and made them to work for China. KWOK claimed that all the secret information in his hand or memory, could be a double-edged sword: to benefit China if he used it

¹⁰⁰ <https://youtu.be/uT-WsV7eThU> (1:00:50 – 1:02:00)

to work for China, or to benefit USA if he surrendered it to USA. That is of course an intimidation and a lure to President Xi Jinping to recall/rehire KWOK as a Chinese spy agent.

212. KWOK repeatedly raised his proposals or suggestions to the CCP, and advised the CCP that who was their enemy and who needed to be destroyed. KWOK also mentioned that MSS and GHID used to have some well-designed plans to destroy Chinese dissidents. One of such plan was named "Fox Hunting Action", which applies unrestricted warfare¹⁰¹ strategies to destroy Chinese dissidents.

213. KWOK had already filed law suits against some of the 8 Chinese dissidents and asked for huge amount compensation. For example, in the lawsuit against SINO (Index No. 151430/2018), KWOK asked \$100 million for compensation. KWOK believed that it worth \$100 million to destroy each of the 8 Chinese dissidents. That number might be the estimated value given by MSS, and KWOK believed that MSS should pay him \$100 million for destroying each of the 8 Chinese dissidents.

214. In summary, KWOK had strong motivation to destroy Chinese dissidents, including Plaintiff. By destroying Plaintiff, KWOK believed that he was helping the Chinese government to destroy its enemies, and thus could be forgiven by Xi Jinping, and could be compensated by the CCP. It is another high profitable business that KWOK was used to do and specialized to do.

KWOK Started His Campaign to Destroy Some Chinese Dissidents, Including Plaintiff

215. In order to destroy Plaintiff and other Chinese dissidents who were listed as targets by KWOK, KWOK not only has motivations and plans, but also put it in action.

216. KWOK repeatedly propagated his \$100,000 award announcements to call for females to false accuse the 8 Chinese dissidents, including Plaintiff, along with SINO, Li Weidong, Xia Yeliang, Wei Shi, Teng Biao, Li Hongkuan, and Tang Baiqiao. KWOK gives the above mentioned people a **racial epithets**: "Weilei" (伪类), which KWOK further explained as faked human or poor garbage. KWOK cursed these people on daily basis, and called them as garbage, gangster, rouge, shit, incest, kinky, and whatever dirty names that KWOK could make up or imagine.

¹⁰¹ <http://www.c4i.org/unrestricted.pdf>

217. On **November 21, 2017**, as shown in **Exhibit V-63**¹⁰², KWOK published a video recording of himself to his “郭文贵” YouTube account wherein KWOK stated: *“Remember those names, Wei Shi, SINO, Xia Yeliang, Li Weidong, Tang Baiqiao, Li Hongkuan, who else? I can’t remember all of them, later I will add more names. Whoever, especially females, can stand up to accuse the above mentioned man for sexual harassment or raping, as long as you signed the contracts, I will give you \$100,000 immediately, and I will be responsible for all of your attorney fees.”*

218. KWOK particularly mentioned LIU and stated that *“Ah, Liu Gang is also in the list. If anyone has anything against Liu Gang, please give it to me. All people should remember, you can send me or posted on Twitter anytime you have tips (against them). You can also send it to Mr. Guo Baosheng, Mr. Pan Qing. Both of them can represent me completely. Or you can contact with me directly. If you feel inconvenient to discuss it with men, you can contact with Wuting[黄子茵] and let she represent me to take care of the case. Sorry, I haven’t got her approval yet. And then my attorneys will meet you. Up until now, I have found 4 people, three of them already accepted, while one of them is still hesitating, and two of them have received \$100,000. We have done this for couple of months now.”*¹⁰³ KWOK stated at the end of this video that *“I will do unscrupulously and at all costs to destroy all the above mentioned hybrids, and just like what I have done to Wang Qishan, Meng Jianzhu, and other State thieves.”* This video containing false and defamatory statements regarding Plaintiff has been viewed by at least 126,292 times. It was also republished by KWOK’s supporters over hundred times.

219. Also as shown in **Exhibit V-63**, KWOK called for people, especially women, to file lawsuit against the above mentioned 8 “Weilei”, and promised that for those whoever could provide tips to make any of the 8 “Weilei” into jail, he would pay \$100,000 cash immediately. KWOK also repeatedly mentioned that he had set \$50 million aside as a fund that would be used to destroy the above mentioned 8 “Weilei” through whatever methods.

¹⁰² <https://youtu.be/9fzY7z0bgdw?t=493> (8:12 – 23:20)

¹⁰³ <https://youtu.be/9fzY7z0bgdw?t=1347> (22:30 - 23:40)

220. Also as shown in **Exhibit V-63**, KWOK appointed the following people as his plenipotentiaries: Baosheng Guo, Qing Pan, Wuting (Twitter ID @wutingZY), to find such kind females to false accuse the 8 “Weilei”. KWOK also stated that he had already found 4 females who would like to accuse the 8 Chinese dissidents, and 2 of them had already accepted \$100,000 as award for doing this kind work for KWOK.

221. As shown in **Exhibit V-64**¹⁰⁴, in his **February 5, 2018** live-streamed video on GUO.MEDIA, KWOK stated that *“In order to destroy those Weilei and faked dissidents, who take advantage of the democracy movements to do faked asylum, KWOK announced seriously: from now on, anyone who want to accuse those Weilei for faked asylum and providing faked documents, please provide your documents and evidences to us. You can contact with our Twitter Party’s clerks Guo Wenhui and Sara. Once you signed contract with my attorneys, I will pay you immediately. What you need to do is simply to do testimony at the court as witness to show that you are cheated by the Weilei, and they provided faked documents and faked evidences. Then you could be pardoned by INS and you can get asylum. Then you can earn money legally. I will do my best to support you.”*

KWOK Started Legal Warfare against Some Chinese Dissidents, Including Plaintiff

222. On **December 23, 2017**, as shown in **Exhibit V-65**¹⁰⁵, KWOK published a video recording of himself to his “郭文贵” YouTube account, wherein KWOK described his plan to file lawsuits against the 8 Chinese dissidents, including Plaintiff. KWOK maliciously cursed each of the 8 Chinese dissidents with fabricated allegations.

223. As shown in **Exhibit V-65**¹⁰⁶, when talking about SINO, KWOK stated that *“SINO is a suspect of theft through cyber-attacks, unregistered agent who espionage for China in USA, sexual harass females, raping, created faked documents, the lawsuit is under processing.” “Shit SINO is the most evil I have ever seen. To call him shit is a insult to shit. Let’s see how long you can survive.” “You steal documents through cyber-attack, you are hacker.”* All these accusations

¹⁰⁴ <https://youtu.be/mKdzqSGGLbU> (0:00 - 1:17)

¹⁰⁵ <https://youtu.be/OAq2aGC3MrQ> (52:36–56:40)

¹⁰⁶ <https://youtu.be/OAq2aGC3MrQ?t=3156> (52:36 - 53:58)

against SINO are false. Instead, KWOK has been sued for each of these crimes in China as well as in USA.

224. As shown in **Exhibit V-65**¹⁰⁷, when talking about LIU, KWOK stated that *"Liu Gang, you madman, you are suspects of extortion, create faked documents, rape and harass females, the lawsuit against you is under processing. You can no longer pretend to be madman. I will change you back to normal person. Liu Gang, you can cheat others easily. Let's see, your raping activities, you raped others right in a car, then intimidate the victim."* *"Liu Gang, dare to file lawsuit against me? You are animal from Peking University."* These allegations against LIU are false and made LIU very anguish and depression.

225. The **December 23, 2017** video containing false and defamatory statements regarding Plaintiff has been viewed by at least 230,816 times.

226. Inspired by KWOK, some of KWOK's followers/supporters/aids even frequently posted the so called "most wanted list" or "list of deaths", and some of KWOK's supporters tried to harass/stalking/chasing/following those 8 "Weilei". As shown in **Exhibit V-66**¹⁰⁸, one of such kind "list of deaths" posted by KWOK's followers are widely spread through many websites or social medias, which called for KWOK's followers/supporters to kill 21 people including Plaintiff.¹⁰⁹

227. On or about **March 12, 2018**, KWOK posted a video on his GUO.MEDIA and many of his supporters republished on YouTube, as shown in **Exhibit V-67**¹¹⁰, wherein KWOK cursed the 8-Weilei and stated that *"Compared with KWOK, you are even worse than a fart, you are worse than anything in my toilet. You are nothing. Your life is worse than my driver. Remember, your mother, your sisters will all die tragically. They will all die without a burial place."*

KWOK Threatened Ma Rui Who Filed Lawsuit against KWOK for Raping

228. Ms. Ma Rui used to be an assistant and employee of KWOK. Ma Rui filed lawsuit

¹⁰⁷ <https://youtu.be/OAq2aGC3MrQ?t=3340> (55:40–56:40)

¹⁰⁸ <https://twitter.com/ywxk3/status/960772952764571648>

¹⁰⁹ https://twitter.com/lvv2_robot/status/960830473466507266

¹¹⁰ https://youtu.be/_avx-CFw7ro (0:34 – 1:39)

against KWOK for raping with the Supreme Court of The State of New York (Index No. 158140/2017). KWOK repeatedly defamed Ma Rui. In **September, 2017**, KWOK published a video recording of himself to his “郭文贵” YouTube account, as shown in **Exhibit V-68**¹¹¹, wherein KWOK stated that: *“It was Ma Rui who raped KWOK and most of KWOK’s bodyguards”; “Ma Rui is so ugly such that no man would rape her”; “Ma was mentally ill and even a pig would not rape her”; “Ma would be killed soon or later.”*

229. KWOK repeatedly threaten or abuse others like what he had done to Ma Rui. Because of KWOK’s raping and assaulting, Ma Rui was in deep depression and hospitalized for several times. That is a normal pattern for KWOK to abuse or threaten other people to go into deep pressure and then in deep depression or anxiety.

KWOK Discriminated People Based on Wealth/Health/Appearance/Sperm

230. On **March 11, 2018**, KWOK published a video recording of himself to his “郭文贵” account on GUO.MEDIA, as shown in **Exhibit V-69**¹¹², wherein KWOK stated that *“I received an earnest letter from a California-based agency that specializes in test-tube babies. Due to request from many their clients, the letter states, ah, they were willing to buy Wengui’s sperm from me. It is required to take five times each year and adopt successful sperm. According to the price, it will be paid 50,000 US dollars, 50,000 US dollars! Any one customer bought from me, and selected the wealthy mature sperm of Wengui’s from their warehouse, would pay fifty thousand dollars! As a result, when my lawyers contacted with the agency, it was not a joke. It is said that there are more than two thousand people who requested to buy Wengui’s sperm. Even if it is 2,000 requests, and each pays 50,000 dollars, how much money? It’s really expensive. Wow, I said Wengui is not good enough, (I am) Guo three seconds (impotence), right? That is not healthy. Even more, Guo Wengui has gene of raping, ah, a rapist, this is really not good, ah. Later, yesterday, last weekend, my lawyer, ah, told me that the head of that agency returned to New York, and met with our lawyer privately, saying that he especially wanted to do the deal.”* And he also

¹¹¹ <https://youtu.be/z6l0oEvXwws> (0:00–1:34)

¹¹² https://youtu.be/2XN9L0KO_10 (0:00–3:31, 5:21–6:14)

stated that *"Then, after some years, the number of Guo Wengui's family may have thousands of people around the world, and may be hundreds of thousands of people."*

231. KWOK, specifically mentioned the 8 Weilei and other Chinese dissidents, then claimed that *"Those garbage, such as Chen Jun, Hu Ping, Incest Biao, Wei Shi, SINO, Li Hongkuan, posted marriage ads everyday. How many people have they cheated? They cheated money of others. Who will need their sperms? No way."*

232. KWOK propagated that no one would want 8 Weilei's including plaintiff's sperms, because they had bad health, unhealthy sperms, and their sperms could cause others get cancers. After viewing this video, Plaintiff's girl-friend immediately asked him to be checked by doctor and make sure that he would not spread cancers.

233. Right after KWOK gave this speech, many of KWOK's supporters were so excited and claimed that KWOK's gene and sperm were the best, and thus all the people in this world should be created by KWOK's sperm. KWOK and his supporters believed that KWOK's gene was superior and should be selected as the only gene for human beings. KWOK clearly advocated Genelism, which even worse than Hitler's racism.

234. KWOK discriminated people based on health. He repeatedly claimed that he did exercises everyday and he was the most healthy Chinese man, whereas the Plaintiff and the 8-Weilei were all psychically ill and madmen.

235. KWOK discriminated people based on wealth. He repeatedly claimed that he was the richest Chinese man, whereas the Plaintiff and the 8-Weilei were all poor like beggar or lived in shelter for homeless.

236. KWOK discriminated people based on appearance. He repeatedly claimed that he was one of the most handsome Chinese men, whereas the Plaintiff and the 8-Weilei were all ugly like toad/mole/shit and should be shamed of living in this world.

237. KWOK repeatedly claimed that it was his sperm made him handsome/healthy/wealthy, and that is why each of his sperm worth \$50,000.

238. Based on his Genelism beliefs, KWOK even had a plan to start his own religion group.

In the **May 11, 2017** live-streamed video on GUO.MEDIA, as shown in **Exhibit V-69**¹¹³, KWOK stated that *"Yu Chen, don't angry. You want me to have hundred new babies to fight for our exposure? There is no need to do that. If I had thousands babies, I would have them to serve for all of our fighter comrades at Pangu Plaza. All of them are just a copy of KWOK with the same appearance and would applause to you: welcome my dad's fighter comrades. So lovely."* and he added that *"I think it would be a good idea. For all of our fighter comrades to live together, we can go to a big mountain, and set up a new religion, we can name it as Exposure Religion, Fighter Group, or Exposure Fighter Group. We can live together for our rest of life. So wonderful. This idea is a extremely great."* KWOK described his plan to start his religion group. His plan made many of his supporters so excited and anxious to join him and to devote themselves to him. KWOK used to use this kind trick to lure people to support him and to fight for him.

239. KWOK's campaign against the "8-Weilei" is partially based on his Genelism beliefs and his cult plan.

KWOK Started/Sponsored the Gun Party

240. In or about **May, 2017**, KWOK frequently contacted with Zhaoming to discuss recruiting fighters to help KWOK. Some of their conversations are recorded and are posted on YouTube, as shown in **Exhibit V-70**¹¹⁴, wherein KWOK advised Zhaoming that *"Brother Zhaoming, you must keep it in mind that the number of the people you have now is absolutely not enough. You must recruit about 50 to 100 people."* KWOK also told Zhaoming that *"Remember, never give them too much money, never feed them too full. Anyone who is too full cannot be trusted. In other words, a hungry fighter is more loyal, right? If he wants too much, such as houses and cars, we will not give them those. We are not that foolish."*

241. In another phone conversation between KWOK and Zhaoming, as shown in **Exhibit V-71**¹¹⁵, KWOK further advised Zhaoming that *"You should lead our brothers to stand up. Understood? Our goal is to destroy Wei Shi, to destroy Hu Shuli, and to destroy SINO, so we can*

¹¹³ <https://youtu.be/fjFY3qzv9Os> (27:55–30:40)

¹¹⁴ <https://www.youtube.com/watch?v=iOt6tue7f8U> (0:26–3:10)

¹¹⁵ <https://youtu.be/q9yvvhJgHIIs?t=7> (0:07–0:22)

stand high in this world.” KWOK particularly told Zhaoming that these people would be used to destroy Wei Shi and SINO, and later his targets expanded to the 8 Weilei and some other Chinese dissidents.

242. The phone conversation between KWOK and Zhaoming disclosed that KWOK provided money to Zhaoming and asked him to recruit about 100 people to be ready for KWOK’s campaign. KWOK later paid those people to do some works such as create faked documents, to follow/harass some people per KWOK’s requests, especially to destroy Plaintiff and those who were targeted by KWOK.

243. On **August 7, 2017**, KWOK and many of his supporters published a video on YouTube as shown in **Exhibit V-72**¹¹⁶, wherein one of KWOK’s posts displayed on the screen and stated that *“I was extremely touched when I viewed this video. Thank you my handsome brother.”* Then one of KWOK’s supporter with guns in hand and stated that *“Hello, comrades. Our movement to support KWOK is started formally all over the world. We American Chinese support KWOK with armed guns.”* This video sounds like a copy of recruitment poster for US Army, and called for people to fight for KWOK with guns.

244. Since then many KWOK’s supporters repeatedly showed off their guns on Twitter and claimed that they would kill those who do not support KWOK.

245. As a response to KWOK’s call for using guns to fight for him, two weeks later, Zhaoming and Guo Baosheng started their armed organization – “Gun Party”.

246. On **August 23, 2017**, as shown in **Exhibit V-73**^{117 118 119}, Zhaoming posted some pictures to show his guns on Twitter and stated that *“Zhaoming declared the announcement of the Gun Party: I was extremely touched by some brothers on Twitter. They may not talk too much and may not contact with others frequently. However, they are watching the situation attentively. Whenever KWOK or any of our brothers were threatened, we will response to [KWOK’s] order to*

¹¹⁶ <https://youtu.be/RKzi7rosP1c> (0:24-1:10)

¹¹⁷ <https://twitter.com/ZhaoMingObserve/status/900430682576388096>

¹¹⁸ <https://twitter.com/zhaomingobserve/status/900426011241660416>

¹¹⁹ <https://twitter.com/milpitas95035/status/900411210490925056>

pull our guns out immediately. All of our brothers can sacrifice our lives to fight for KWOK. I may not remember your names, but I will never forget your guns.”

247. Then, as shown in **Exhibit V-74**^{120 121}, many of KWOK’s supporters joined the “Gun Party”, including Zhao Yan, Guo Baosheng, Zhuang Liehong, Zeng Hong, Ziwen, Jin Qingmin, etc., and they repeatedly show off their guns and other weapons on various social media.

248. As shown in **Exhibit V-75**¹²², since **July 2017**, Zhuang Liehong has started the Gun Party and the KWOK’s Endorsement of North America in New York and started training camps to train his Gun Party members.

249. As shown in **Exhibit V-76**¹²³, since **November 2017**, Jin Qingmin and Ziwen have started the Skinhead Party and the KWOK’s Endorsement of West America in California and started training camps to train their Party members.

250. On **December 10, 2017**, Zeng Hong went to the home of Zhang Xinping and cheated her to support KWOK.

251. On **December 20, 2017**, Zeng Hong went to the home of Zhang Xinping again and asked Zhang Xinping to do live-streamd video to support KWOK. Zhang refused to do that, then Zeng Hong threatened Zhang Xinping with 3 guns. Zeng Hong continuously stalked/threatened Zhang Xinping to keep quiet about his relationships with KWOK.

252. On **March 22, 2018**, Zhang Xinping reported to police (police case #18011620) against Zeng Hong for stalking and sexual harassment, As shown in **Exhibit V-77**.

253. On **November 7, 2017**, KWOK published a video recording of himself to his “郭文贵” YouTube account, as shown in **Exhibit V-78**¹²⁴, wherein KWOK stated that “*Many of my supporters have guns, grenade, and weapons. If overseas to Baosheng, to me, to Zhao Yan, to Shen Zhe, to Xiao Min, to the Night of the Book, to the voice of Australia, to continue to hack off customers and continue family threats, and threaten family against Xiao Ping and He Jin, What*

¹²⁰ <https://twitter.com/ZhaoMingObserve/status/900436196177846272>

¹²¹ <https://twitter.com/ZhaoMingObserve/status/914008258016243712>

¹²² <https://twitter.com/kiddjoneke/status/888207942457196544>

¹²³ <https://twitter.com/ziwen530/status/957391992643731457>

¹²⁴ https://youtu.be/_O7uukCbAMg?t=2694 (44:56--45:54) (46:09 --46:19)

could happen to the overseas aid society? No one can control it." KWOK called for his supporters to buy and to use weapons, so that they could become powerful fighters for KWOK.

254. In response KWOK's call, many KWOK's supporters frequently post videos or photos to show their guns and weapons, and to show their determination to protect KWOK and to kill KWOK's enemies, as shown in **Exhibit V-79**¹²⁵, Yuan Hongbing, who was considered the God Father of the Gun Party, proposed a war against those who didn't support KWOK. Yuan Hongbing and Zhaoming repeatedly mentioned LIU's name and called for people to accuse LIU and other Chinese dissidents.

255. On **April 28, 2018**, some KWOK's supporters gathered in Tokyo to have a swearing convention to support KWOK, as shown in **Exhibit V-80**¹²⁶, wherein Lai Jianping, the head of the KWOK's Endorsement in Canada, called for an Exposure Revolution, and called for using whatever methods, including using weapons and assassinations to fight for KWOK.

KWOK Sponsored/Lured His Gun Party to Follow/Harass Others, Including Plaintiff

256. KWOK frequently sent his aids/associates/supporters to follow/stalking/harass other people. On **September 7, 2017**, a video was published on YouTube, as shown in **Exhibit V-81**¹²⁷, wherein some of KWOK's phone conversations are recorded. When talking about sending his agents to follow/harass others, KWOK stated that *"Oh yah, from now on, four people riding with a car, open the door, wear on uniforms, with guns in hand, with warning light flashing, either in the morning or midnight, knock on the door, squat, deliver something, take pictures, make videos, and then leave. We will do this every day, either late night or in the early morning. Anyway, make this grandson sleepless. I will kill him to death. I will make him unhappy every day."*

257. As shown in **Exhibit V-82**¹²⁸, KWOK further stated that *"It would be better to find his home, deliver something to him everyday, better to do it at midnight. Knock on his door. Every day, or in the early morning at 6 AM or 7AM. Damn it! I will do it every day. I would be happy to*

¹²⁵ <https://youtu.be/PiDn6bapX1o?t=363> (6:03-6:25)

¹²⁶ https://youtu.be/91_6aRdHP44?t=4120 (1:08:40 - 1:09:26)

¹²⁷ https://youtu.be/y3_JupsVyWI (0:00-0:24)

¹²⁸ <https://youtu.be/LiizaR3NeRk> (0:00-0:36)

pay for it. It is just \$3000 for one day and one person. Just go to his home, make him sleepless everyday, everyday. Remember, it will be never ended until Wei Shi is sent to jail, until Boxun is closed. Their family members would never be free from harassment until Wei Shi and SINO are sent to jail. They should pay back with absolute cost for what they have done to me.”

258. KWOK’s statements expressed how he hates and how he determined to destroy the 8 Weilei, including Plaintiff. KWOK’s statements also tell/lure people how much he would pay – \$3000 per day per person – to those who would stalk/harass the 8 Weilei, including Plaintiff. Here just give some examples.

KWOK Liured/Sponsored Skinhead Party to Harass Tang Baiqiao and LIU

259. Many people are lured by KWOK’s big award. Jin Qingmin gathered some of the gangster members in California and tried to get the award promised by KWOK. Since he heard KWOK’s big award for harassing the 8 Weilei, Jin Qingmin started to give live-streamed videos nearly every day. Jin Qingmin spent most of his time to give live-streamed video, including dinner time, or during driving, or during cooking, and most of his speech are mainly dirty words such as “Fuck LIU”, “Fuck Tang Baiqiao”, “Fuck all Chinese dissidents”, etc.

260. In **November 20, 2017** live-streamed video, as shown in **Exhibit V-83**¹²⁹, wherein Jin Qingmin showed off his gun and stated that *“Tang Baiqiao, why is that difficult to have you post your diploma certificate? You asked me what I was doing? Now, I declare a war against you! You are penis! Do you hear me?”* Jin Qingmin repeatedly threatened Tang Baiqiao and other 8 Weilei in his live-streamed videos.

261. In **November 21, 2017** live-streamed video, as shown in **Exhibit V-84**¹³⁰, wherein Jin Qingmin, along with four other Skinhead Party members, including Ziwen, Luandun, Ding Dayong driving to Tang Baiqiao’s home, and one of them stated that KWOK was coming and watching what they were doing, then Luandun stated that *“Let’s try our best to catch Tang Baiqiao, so that we can get big award from KWOK. Each of us will get half billion dollars. There*

¹²⁹ <https://youtu.be/2WoPZ8ZBw8M?t=4108> (1:08:27-1:08:46)

¹³⁰ <https://www.pscp.tv/w/1YpKkWpBVPyKj>

is no need to do coach job any more.” They were heading to Tang Baiqiao’s home to harass Tang and they had expected to get about \$0.5 billion from KWOK for what they were going to do for KWOK.

262. On their way to Tang Baiqiao’s home, they repeatedly disclosed Tang Baiqiao’s home address and called for more KWOK’s supporters to join them.

263. Once they arrived at Tang Baiqiao’s home, Jin Qingmin along with other 4 Skinhead Party members were all arrested by local police officers. And the whole process were live-streamed on YouTube.

264. On **April 25, 2018**, Jin Qingmin posted some of the police reports or court documents, as shown in **Exhibit V-85**¹³¹, wherein shows the search warrant and the notice for retrieving property, which had several weapons found from Jin Qingmin’s home located at **1509 S Primrose Ave, Alhambra, CA 91803**.

265. On or around **November 24, 2017**, right after Jin Qingmin was released from jail, Zeng Hong came to Los Angeles to celebrate the assault actions launched by the Skinhead Party against Tang Baiqiao and live-streamed there conversations, as shown in **Exhibit V-86**¹³², wherein Zeng Hong threatened Tang Baiqiao that “*Tang Baiqiao, you need to remember that you are nothing. I will always support Jin Qingmin, Ziwen, and all other brothers. I am in Los Angeles now. I am drunken. I always behind them, as I used to do. My heart is always with them.*” And each of these Skinhead Party members who had just arrested for assaulting Tang Baiqiao continuously harass/threaten Tang Baiqiao through Twitter and YouTube.¹³³

266. Because the assaulting activities, Jin Qingmin and his Skinhead Party have been largely praised and awarded by KWOK and KWOK’s supporters. Jin Qingmin was treated as hero and was welcome to give speeches to encourage other Gun Party members to harass those targeted by KWOK. As shown in **Exhibit V-87**¹³⁴, Jin Qingmin was welcome by other Gun Party members,

¹³¹ <https://twitter.com/Hux6pgi2ANGIiUI/status/989169467061100544>

¹³² <https://youtu.be/b6Vj8BdCBB0?t=561> (9:21 – 10:27)

¹³³ <https://twitter.com/laohuhanshan/status/933438033038155776>

¹³⁴ <https://twitter.com/Hux6pgi2ANGIiUI/status/989169467061100544>

including Lu De, Guo Baosheng, Cao Changqing, etc.

267. Since January 2018, Jin Qingmin has been interviewed by Lu De for over dozen times through “Voice of Free China Channel”, which was a channel sponsored by KWOK on YouTube at that time, as shown in **Exhibit V-88**¹³⁵. In these interviews, Jin Qingmin always showed up with Beethoven's Hero Symphony as background music. These live-streamed videos have been republished by many KWOK's supporters and have been viewed over millions viewers. Due to these interviews, both Lu De and Jin Qingmin became widely known in Chinese society and were treated as heroes. Obviously, these interviews are calling for people to follow Jin Qingmin's example to harass/assault people who were targeted by KWOK.

268. Jin Qingmin repeatedly mentioned KWOK's name and asked more money publicly. As shown in **Exhibit V-89**¹³⁶, wherein Jin Qingmin knelt and stated that *“a Villain is also a human being. He gave me at least one dollar. Now I kneel down to you. As I started to beg for money, I don't have face anymore. I don't want face anymore. I do as promised. I kneel down now.”* Jin Qingmin publicly knelt down to ask people to give him money for what he had done for KWOK.

269. Jin Qingmin not only try to earn easy money by publishing live-streamed videos to defame those who were hated by KWOK, but also recruited/trained other people to do so. As shown in **Exhibit V-90**¹³⁷, Jin Qingmin taught and trained other people to earn money by posting videos and stated that *“I already told you what need to be done. I told you that you should know who should you fight against. You want to get extra jobs? I want to tell you now, you just disclose all the dirty things and make it published. That's it. You just tell what happened and then clean up yourself, which means you do things for money, you just want to make money. It is not shame for doing that. I have finished my words. I am just a message deliver. I finished my job now.”*

270. Ziwen is another member of Skinhead Party and had accompanied Jin Qingmin to stalk Tang Baiqiao. Ziwen knew clearly why Jin Qingmin did that and how KWOK related to that

¹³⁵ <https://youtu.be/ZKHrCRoNv5Y>

¹³⁶ <https://www.pscp.tv/laohuhanshan/1DXxyEdNVPExM> (36:20-37:37)

¹³⁷ <https://youtu.be/ZFqD4nqxyYs> (21:20-24:50)

event. As shown in **Exhibit V-91**¹³⁸, in a phone conversation with his close friend, Ziwen stated that *"This is the latest news. Prosecutors said that Jin Qingmin would be a tainted witness, and he would accuse that it was KWOK, Lu De and Guo Baosheng who had behind the scenes. I will let you know whenever I have any new tips. You need to warm up with your video program, now it is our major source of income. We have to live on it."* Ziwen knew who sponsored them to assault Tang Baiqiao and he had expected to get \$0.5 billion from KWOK for attacking Tang Baiqiao.

271. Sponsored and lured by KWOK with big award, Jin Qingmin and his Skinhead Party defame and harass LIU and other Chinese dissidents nearly everyday.

272. On **October 2, 2017**, as shown in **Exhibit V-92**¹³⁹, Jin Qingmin stated on Twitter that *"Liu Gang is a bastard whom I fucked"*.

273. On **November 29, 2017**, as shown in **Exhibit V-92**¹⁴⁰, Jin Qingmin stated on Twitter that *"I give live-streamed video now and give a lesson to Li Hongkuan, Liu Gang and others. Dare you a man? Are you fathers of someone? Do you have children?"*

274. On **November 30, 2017**, as shown in **Exhibit V-92**¹⁴¹, Jin Qingmin stated on Twitter that *"My son is excellent. The problem is there are some bitches who couldn't afford to raise their own sons, and made their sons and wives to be special agents. Liu Gang, are you a bitch or human beings? You lived in shelter for homeless. Is that what Peking University educated you to be?"*

275. On **December 1, 2017**, as shown in **Exhibit V-92**¹⁴², Jin Qingmin stated on Twitter that *"Liu Gang was living in shelters in New York. He taught KWOK how to arrange his furniture. Haha, he is a bitch."*

276. On **December 1, 2017**, as shown in **Exhibit V-92**¹⁴³, Jin Qingmin stated on Twitter that

¹³⁸ <https://youtu.be/ZudBC1c9DBE> (1:06--1:25)

¹³⁹ <https://twitter.com/laohuhanshan/status/914908082823618560>

¹⁴⁰ <https://twitter.com/laohuhanshan/status/936460956372054016>

¹⁴¹ <https://twitter.com/laohuhanshan/status/936510752973660160>

¹⁴² <https://twitter.com/laohuhanshan/status/936511636562632704>

¹⁴³ <https://twitter.com/laohuhanshan/status/968549285334728704>

"Liu Gang pretended to be dead and dared to response to me. He lives with SINO together. His boss didn't know how to response to me. Liu Gang is an old bitch. He is watching his boss' face and will response soon."

277. Sponsored and lured by KWOK with big award, Jin Qingmin and his Skinhead Party also made live-streamed videos to defame/harass LIU and other Chinese dissidents on daily basis. **Exhibit V-93** only lists some videos live-streamed by Jin Qingmin within four days from April 22, 2018 to April 26, 2018.

278. As shown in **Exhibit V-93**¹⁴⁴, in the **April 22, 2018** live-streamed video on Periscope and Twitter, Jin Qingmin stated that *"Liu Gang, what is the fucking relationship of the 8 Weilei with me? You can file lawsuit against me. Liu Gang, you have taken too much medicine today. You want to sue me? I curse you now. Liu Gang, fuck your mother. Fuck your grand mother."*

279. As shown in **Exhibit V-93**¹⁴⁵, in the **April 24, 2018** live-streamed video on Periscope and Twitter, Jin Qingmin stated that *"Liu Gang is a penis, mentally mad. Liu Gang, I fuck your mother. Go to hell and file lawsuit against me. Liu Gang, I fuck your mother, do you listen to me? I fuck your mother. If you hadn't heard of that, I curse you again, Liu Gang, I fuck your mother."*

280. As shown in **Exhibit V-93**¹⁴⁶, in the **April 25, 2018** live-streamed video on Periscope and Twitter, Jin Qingmin stated that *"Liu Gang is mentally mad, a standard madman. Liu Gang, I curse you everyday. Liu Gang, I fuck your mother. Go to hell and file lawsuit against me. Liu Gang, I fuck your mother, do you listen to me? I fuck your mother. If you hadn't heard of that, I curse you again, Liu Gang, I fuck your mother."*

281. As shown in **Exhibit V-93**¹⁴⁷, in the **April 25, 2018** live-streamed video on Periscope and Twitter, Jin Qingmin stated that *"Xia Yeliang, Fuck your mother! Gougou told me that you were friends, and I wouldn't curse him. Now, you came out to give me advice. Xia Yeliang, I cursed earlier. Fuck your mother. Xia Yeliang, come on, come to California to sue me. I am*

¹⁴⁴ <https://www.pscp.tv/w/1eaJbpVnclnKX> (0:54 - 1:40)

¹⁴⁵ https://youtu.be/PG_FbftInlI?t=332 (5:35 - 6:10)

¹⁴⁶ https://youtu.be/PG_FbftInlI?t=332 (5:35 - 6:10)

¹⁴⁷ <https://youtu.be/2OLSGFv5r5Y?t=325> (5:25 - 5:40)

cursing you now. Xia Yeliang, you mother fucker, I fuck your mother. Ah, professor, if you call yourself professor again, I will punch you with my shoes. I fuck your mother.”

KWOK Paid/Lured People to False Accuse Plaintiff and Other 8 Weilei

282. On **December 12, 2017**, KWOK published a video recording of himself to his “郭文贵” YouTube account, as shown in **Exhibit V-94**¹⁴⁸, wherein KWOK stated that “*SINO cheated money through Ling Wancheng. SINO involved in felony charges, sexual harassment, raping, and prostitutes related business. Liu Gang is even worse. He took advantage of his psychiatric problems, to rape girls, and made the girls have babies, then took advantages of his psychiatric problems to avoid feeding babies nor paying child support.*” KWOK also stated that “*Liu Gang wants to be emperor, so that he can rape females and have babies without marriages and without paying money. He asked KWOK to give him \$5 million, while Xia Yeliang asked for \$1 billion. They are day dreamers, madmen, psychiatric patients, patients of fundraising cancers and emperor cancers. You can see those Chinese dissidents, how many of them want to be emperors? That is emperor cancer, fundraising cancer, polygamy cancer, money cancer. Those people, who can make them satisfied?*” and he claimed that he had found women as victims to file lawsuits against LIU and SINO, along with other 8 Chinese dissidents, and he had recorded videos for those women to do testimony against the 8 dissidents. KWOK asserted that “these 8 Chinese have to be wiped out completely.” KWOK’s false allegation against Plaintiff had caused serious problems and even disaster to Plaintiff and Plaintiff’s family members.

283. On or around **December 23, 2017**, KWOK published a video of recording himself to his “郭文贵” YouTube account, and then republished on YouTube by many of his supporters, as shown in **Exhibit V-95**¹⁴⁹, wherein KWOK stated that “*We can’t transfer our personal hate and resentment against the CCP and our government, and make people to revenge with you together against CCP. That is what morale abduction. Such as Li Hongkuan, Wei Shi, SINO, Xia Yeliang, incest Ten Biao, Li Weidong, these animals, and Tang Baiqiao. These people are motivated by*

¹⁴⁸ <https://youtu.be/AsBoFhUW7n4?t=2654> (44:14-54:41)

¹⁴⁹ <https://youtu.be/OAq2aGC3MrQ?t=6457> (1:47:37–1:48:35)

resentments, and thus are cheaters, fraudsters. We can't let them to abduct us to do their democracy. What type democracy they are going to do? They are specialized to have women on to Li Hongkuan's bed through democracy, especially girls from Human to be abducted on to their beds, and have them transplanted with HPV virus, and refused to feed their new babies." "Just three minutes right after he met with girls, Liu Gang raped others in his car and had new babies, and refused to feed his babies, and pretended to be mental illness, intimidated others. We will go to hell if we let these people to fight for our democracy."

284. KWOK repeatedly stated that LIU had been diagnosed mental illness by doctors and judges. In fact, LIU was tortured in Chinese prison from 1989 to 1995. Right after enrolled in Columbia University in 1996, LIU visited psychiatrist to have a regular examination. In 2012, LIU was ordered by Judge Thomas Miller to be checked by doctors, and the court gave strict orders to keep the doctor's report as highly confidential, and even didn't allow LIU himself to get the related doctor reports. However, Ye Ning and Zhao Yan had tried to contact the Court to get the relevant doctor reports and tried to use the medical reports to ruin/destroy LIU. KWOK bought LIU's medical reports from Zhao Yan and Ye Ning, and by disclosing the health information of LIU to destroy LIU. As shown in **Exhibit V-32**, **Exhibit V-33**, and **Exhibit V-35**, KWOK repeatedly solicited/paid people to steal medical reports or other privacy information of the people he targeted at. KWOK frequently used medical reports to threaten/defame/extort his targets by disclosing privacy information. That is one of the usual pattern of KWOK used to do. He had applied this pattern to Li You and Xiao Jianhua. Now, he was applying this pattern to defame/extort/threaten LIU.

285. On or around **February 8, 2018**, KWOK published a video of recording himself to his "郭文贵" YouTube account, and then republished on YouTube by many of his supporters, as shown in **Exhibit V-96**¹⁵⁰, wherein KWOK first alleged that Plaintiff and the 8 Chinese dissident sent their mothers and wives on street as prostitutes to make money, then threatened to file lawsuits against them. KWOK stated that: "*I will teach all of you a lesson with American laws.*"

¹⁵⁰ <https://youtu.be/Y6o1fF1NXKY> (3:36–5:28)

(4) Li Hongkuan;

(5) Tang Boqiao;

(6) SINO;

(7) Wei Shi;

(8) Teng Biao.

288. As shown in **Exhibit V-63**¹⁵², KWOK appointed the following people as his plenipotentiaries: Baosheng Guo, Qing Pan, Wuting (Twitter ID @wutingZY), to find such kind females to false accuse the 8 Chinese dissidents. KWOK also stated that he had already found 4 females who would like to accuse the 8 Chinese dissidents, and 2 of them had already accepted \$100,000 as award for doing this kind work for KWOK.

289. On **March 5, 2018**, Baosheng Guo published a video of recording himself to his “郭寶勝政論” YouTube account, as shown in **Exhibit V-98**¹⁵³, wherein Guo Baosheng described how he followed the instructions of KWOK to meet Li Hong and to create the video to false accuse Xia Yeliang. Guo Baosheng also stated that *“For example, there is a female victim of sexual harassment. She said she would be happy to sue LIU. However, as she already married with an American, and had children, so she gave it up at the last minute. Because she was afraid to be broken with her husband if she speak it out. So, to avoid family problems, she gave it up.”* Guo Baosheng disclosed that he had contacted with LIU’s ex-girl-friend and had created similar video to false accuse LIU for raping.

290. On **December 3, 2017**, Guo Baosheng posted a tweet with a photo attached to his “@milpitas95035” Twitter account, as shown in **Exhibit V-99**^{154 155}, wherein Guo Baosheng drunk Maotai alcohol with his friends Zhao Yan and Ye Ning in New York. Guo Baosheng stated that the Maotai alcohol was given by KWOK, and KWOK had claimed that each bottle of his Maotai had the market value as a house. Guo Baosheng confessed that he received large amount

¹⁵² <https://youtu.be/vkfnD5Ek8sM> (22:30 – 23:20)

¹⁵³ <https://youtu.be/zLwNiRQvLVM> (14:35 – 19:03)

¹⁵⁴ <https://twitter.com/milpitas95035/status/937522315688120320>

¹⁵⁵ <https://www.trendsmap.com/twitter/tweet/936376194303438849>

of money from KWOK and that was why he played the role of plenipotentiary for KWOK and did the dirty job for KWOK. Right after their Maotai Party, around **March 6, 2018**, Ye Ning told SINO that Guo Baosheng asked Ye Ning to find Ms. Chen Ruihong to file lawsuit against SINO for raping. However, Ye Ning refused to do so. Then, Guo Baosheng and Zhao Yan tried to find other ladies to create videos similar to the video against Yeliang Xia as shown in **Exhibit V-97**.

291. In his **May 11, 2018** live-streamed video on YouTube, as shown in **Exhibit V-99**¹⁵⁶, wherein Guo Baosheng stated that *"Regarding my relationship with KWOK, first I need to say that I got money from KWOK with 4 transactions, not 9 transactions. The first transaction is happened in June 2017. At that time, I found some of Weilei hold conferences to criticize KWOK, then I proposed to KWOK to have our own conferences to propagate KWOK's positive impacts and fight against those Weilei. KWOK agreed my proposal. I started to prepare for it. Couple of days later, KWOK told me through phone that there was no need to have that conference. KWOK asked me to provide him my bank account information so that he could send me \$10,000 for what I have done for him. After hesitated a little bit, I sent him my bank account information."*

292. Guo Baosheng further stated that *"Regarding the third transaction, it is used for Zhao Yan and I to investigate SINO and others illegal activities. Ms. Wang Yanping was in charge of that project. She told me that I can do the investigation with \$200 as standard expense for each day, and about over one hundred dollars just for hotel. We stayed there for about one week. We got about \$2,000 for doing that project, and it is for two persons expense, Zhao Yan and I."*

293. Guo Baosheng confirmed that KWOK had a project for finding people as tainted witnesses to accuse Plaintiff and other 8 Weilei, and Wang Yanpin was in charge of that project. Guo Baosheng and Zhao Yan received funds from KWOK to travel to New York and California several times to collect evidences and tainted witnesses to false accuse LIU, SINO, and other 8 Weilei.

294. Several ladies, including Ms. Su and Ms. Chen had approached to SINO and told him that Zhao Yan and Guo Baosheng had tried to contact them and asked them to file lawsuits

¹⁵⁶ <https://youtu.be/LLyZtVciDHE?t=198> (3:19–14:16)

against SINO for raping.

295. On **April 4, 2018**, Huang Hebian published a video to his “**黄河边播报**” YouTube account, as shown in **Exhibit V-100**¹⁵⁷, wherein stated that *“The Xia Yeliang sexual harassment video was actually the BBC interview with the Chinese Female star Zheng Jingchu. Even through blurring and editing, we can still find out that the back ground. The sofa and the postures between the two videos are all the same.”* It turned out that KWOK used a video of BBC interviewing Zheng Jingchu to accuse Xia Yeliang met and raped Zheng Jingchu, while Zheng Jingchu had no relationship with Xia Yeliang.

296. Based on what KWOK and Guo Baosheng’s statements, both LIU and SINO were so afraid that KWOK had found or bought several women to accuse them for raping, videos similar to the video shown in **Exhibit V-97** might have been created and would be posted online anytime.

297. SINO’s girl-friend also believes that type video would be released soon or later, and she was so upset about SINO and she had to leave SINO alone unless SINO could prove himself.

298. Due to KWOK’s defamatory statements, LIU’s five years old son had started to hate LIU and would be unhappy to meet LIU.

299. KWOK always believes that money can give him capability and power to do whatever he likes, as shown in **Exhibit V-13**¹⁵⁸, KWOK asserted that *“even a father would sell his son as long as he could get enough money, and a man would sell his wife just for exchange a house.”* KWOK believes that \$100,000 could make any woman false accuse against any man, no woman would reject such kind attractive offer.

KWOK Lured/Paid/Called People to Destroy SINO and Other 8 Weilei

300. On **January 15, 2018**, KWOK published a video recording of himself to his “**郭文贵**” YouTube account, as shown in **Exhibit V-101**,¹⁵⁹ wherein KWOK presented SINO’s passport and other sensitive information, which he got illegally. While showing SINO’s passport and the book “Xi and His Lovers” on screen, KWOK stated that *“Please take a look at SINO’s documents, it is*

¹⁵⁷ <https://youtu.be/IZ5sSU3VfsQ> (0:50 - 2:01)

¹⁵⁸ https://youtu.be/Gv5cZ_eFy7Y (6:07 - 6:23)

¹⁵⁹ <https://youtu.be/wECnPUZrf4?t=4269> (1:10:37-1:11:19)

included in his Asylum Application. His application was rejected. Ah, this Xiong Xianmin, because the intelligent agency of USA are investigating him. Just several days ago, I just did testimony with relevant agencies. I can't let this Xiong Xianmin simply survived. He can't be survived. His information on his Visa and his experiences are false, he made it up. I just figure it out, he provided faked information. His son and his family members are all faked information. He should be in prison just for this." Then, KWOK called up his supporters to harass/stalk/destroy SINO mentally/physically using the tips he provided. KWOK also requested/instructed the Chinese intelligent agencies to target or to kidnap SINO for publishing the book "Xi and His Lovers".

301. Ye Ning is an attorney who used to represent SINO for his Asylum application since July 2013. In or about August 2017, Ye Ning told SINO that Zhao Yan had tried to buy SINO's personal information from Ye Ning. Ye Ning rejected to sell his clients privacy information to Zhao Yan. Ye Ning asserted that Zhao Yan repeatedly asked to sleep overnight in Ye Ning's office located at 13510 38th Ave, Flushing, NY, or located at 1150 Connecticut Ave NW Washington, DC 20036.

302. It was either Ye Ning or Zhao Yan who sold SINO's privacy information including his asylum application documents.

303. This video made SINO and his family members very nervous about their safety. SINO immediately made police report against KWOK, and was hospitalized for a while. KWOK had repeatedly posted SINO's passport on various social media. At least millions of people have viewed/downloaded SINO's passport.

304. On **March 3, 2017**, KWOK sent some of his agents/aids to follow SINO to his home. It caused SINO's landlord so scared and was sent to hospital.

305. On **March 3, 2017**, as shown in the video in **Exhibit V-102**¹⁶⁰, wherein several agents sent by KWOK followed/monitored Wei Shi to his home, and Wei Shi spoke to them and took pictures of their car, with plate number "CAH-5921".

¹⁶⁰ <https://youtu.be/bEB7C4OzFr0> (11:10-11:19)

306. KWOK also repeatedly sent his agents/supporters to SINO's and LIU's home located in Flushing. To prevent such kind harassment, LIU and SINO have to move to change their homes, or to live in shelters frequently.

307. On **March 4, 2017**, KWOK met Wei Shi and SINO, as shown in the video in **Exhibit V-103**¹⁶¹, wherein KWOK confirmed that it was KWOK who sent people to go to SINO's home and to Wei Shi's home.

308. Right after the meeting on **March 4th, 2017**, KWOK posted several photos on Twitter¹⁶², as shown in **Exhibit V-104**¹⁶³. In one of his twit, a photo of four men standing shoulder by shoulder with KWOK and in front of an NYPD police car, and KWOK stated: *"I couldn't wait any longer, I will start real actions...Did my brothers threatened you to piss yesterday? These prosecutors and police officers will send you to jail."* Definitely, they are neither prosecutors nor police officers. However, KWOK always posts such kind photos and pretended he had many prosecutors and police officers work for him, and he could easily put anyone into jail. That really scared Plaintiff and other 8 Weilei. SINO was scared to be so paranoid whenever viewing police officers or heard of siren. SINO was so afraid to be arrested by police officers sent by KWOK. SINO was so depression and had committed suicide several times, and had to be hospitalized several times. Through this type threatening posts or videos, KWOK made SINO really nervous and sleepless.

309. On **March 4th, 2017**, KWOK invited SINO and Wei Shi to meet him at the Sheraton Hotel in Flushing. The meeting was recorded and posted on YouTube, as shown in **Exhibit V-105**¹⁶⁴. During the meeting, KWOK not only threatened to destroy SINO, but also confirmed that it was him who sent 3 of his "brothers" or retired police officers to go to SINO's home to harass SINO. KWOK particularly threatened SINO: *"Mr. SINO, today I formally declared to you, you have no way to go!" "Don't try to hide yourselves; You should open your door carefully*

¹⁶¹ <https://youtu.be/pDDRZ-NTwSE> (0:58-1:22)

¹⁶² <https://twitter.com/KwokMiles/status/838029241623195648>

¹⁶³ <https://youtu.be/pDDRZ-NTwSE> (0:58-1:22)

¹⁶⁴ <https://youtu.be/p9NW8B9Qyh4> (08:50-09:56)

whenever it was knocked. Ok?" KWOK not only threatened to make SINO sleepless, but also really sent people to do it day and night as he repeatedly threatened.

310. KWOK threatened/harassed/cursed SINO on Twitter nearly on daily basis. **Exhibit V-106** shows snapshots of some of this kind statements posted by KWOK on Twitter in **March 2017**.

311. As shown in **Exhibit V-106**¹⁶⁵, on **March 4, 2017**, KWOK asserted on Twitter that *"Mr. Zhao Yan has a great insight. After today's meeting, I have a better impression to Wei Shi, but SINO is worse than a eunuch and a traitor without any made ups. I have a new plan to have him exported and executed in China. SINO is too wretched and disgusting. He is too ugly to make all Chinese shamed. I found my English was so great once I heard his English today. His parents should be shamed to have such an ugly son."*

312. As shown in **Exhibit V-106**¹⁶⁶, on **March 6, 2017**, KWOK asserted on Twitter that *"Today is a good day. I get up in the early morning, and read this objective and super excellent article written by Mr. Tang Baiqiao. Tang Baiqiao. This is the power, charm and warmth of tweets. Wengui thanks Mr. Tang from the bottom of my heart. Wei Shi, SINO and their boss must be executed. They are evil threats to Chinese abroad, and must be eradicated. It's only the beginning."*

313. As shown in **Exhibit V-106**¹⁶⁷, on **March 21, 2017**, KWOK asserted on Twitter that *"@weryunchao KWOK will gamble once with Wei Shi's supporters: Mr. Wei Shi and Mr. SINO will be indicted by prosecutors for extortion and tax evasion. Any crime will be indicted by prosecutors. I only ask you to attend my celebration party in New York, and drink with Wengui for my grassroots honesty and courage. If by the end of 2017, they are still fine, I will still have party on Chinese New Year of 2018, invite you to drink, and give everyone one million dollars as compensation. Who wants to sign?"*

¹⁶⁵ <https://twitter.com/kwokmiles/status/838748461407272960>

¹⁶⁶ <https://twitter.com/KwokMiles/status/838194385825247232>

¹⁶⁷ <https://twitter.com/KwokMiles/status/844235747171491840>

314. As shown in **Exhibit V-107**¹⁶⁸, on **May 8, 2017**, KWOK posted Wei Shi's personal bank account information on Twitter and stated that *"Here are evidences regarding Boxun, Wei Shi, SINO blackmailing, deleting pages, receiving money, bank transactions, and an attorney's letter from the payer side to the US government agencies. The total criminal funds is about \$390,000. These transactions hadn't reported to IRS. We should take advantage of the judicial system to fight for our dignity and righteous. We should fight against them through legal system."*

315. Also as shown in **Exhibit V-107**, KWOK posted a letter and claimed that it was an attorney's letter from the payer side to the US government agencies. In fact, this letter doesn't have any signature or certified. Obviously it is a faked letter forged by KWOK himself. KWOK lied about this letter.

316. KWOK not only threaten/harass Plaintiff by himself, but also frequently requested others to threaten/stalk/follow Plaintiff.

317. For example, KWOK repeatedly asked Zhao Yan to accuse and even to destroy SINO. Zhao Yan used to be a close friend of SINO and worked as colleagues with Boxun. Zhao Yan also used to be a Chinese police officer and a member of CCP in City of Haerbin. KWOK frequently asked or even forced Zhao Yan to harass or even physically attack SINO.

318. As shown in **Exhibit V-108**¹⁶⁹, on **May 8th, 2017**, KWOK asked Zhao Yan to destroy SINO and stated: *"Mr. Zhao, Regarding Wei Shi and Sino, you must attack offensively right now. You must show your Justice, courage, and fairness by doing some actions."* In another tweet, KWOK stated that¹⁷⁰: *"Mr. Zhao, I am looking forward for your action's results. Don't let the bullet flying too long before it destroys the targets."* That is a clear message or order to ask Zhao Yan to attack or assault SINO.

319. Zhao Yan responded immediately to KWOK and promised to do whatever KWOK requested him to do. Just two hours later, On **May 8, 2017**, Zhao Yan gave live-streamed speech through his "赵岩" YouTube account to accuse LIU and SINO.

¹⁶⁸ <https://twitter.com/KwokMiles/status/861640647069007872>

¹⁶⁹ <https://twitter.com/KwokMiles/status/861661655742263296>

¹⁷⁰ <https://twitter.com/KwokMiles/status/861671418936930308>

320. In his **May 8, 2017** live-streamed video, as shown in **Exhibit V-109**¹⁷¹, Zhao Yan accused LIU and SINO were Chinese spies and received money from CCP.

321. In another **May 8, 2017** live-streamed video, as shown in **Exhibit V-109**¹⁷², Zhao Yan used faked documents provided by KWOK to accuse SINO having received \$6 million from the Chinese intelligent agencies. Zhao Yan simply repeated what KWOK defamation statements, and had damaged SINO's reputation among a large number of people. However, KWOK was not satisfied with Zhao Yan's denouncement against Wei Shi and SINO, saying: *"Zhao Yan's denouncement against Wei Shi and SINO was not as strong as expected. Wei Shi and SINO need to be attacked fatally."*

322. On **August 12, 2017**, KWOK published a video of recording himself to his "郭文贵" YouTube account, as shown in **Exhibit V-110**¹⁷³, wherein KWOK repeated his gambling deal and asserted that *"I just let Boxun and SINO to fully demonstrate their mean, lies, fears, and the boss behind them. Everyone has already seen it clearly. Then I let him perform again and again, ugly, and then make him become crazy again and again. However, I have filed lawsuit against him through legal procedures. As I said, I can make a bet with anyone, If anyone dares to say that Wei Shi and SINO still alive in the USA, or have not been prosecuted, or haven't been punished through judicial systems until the end of the coming Spring Festival, I, Guo Wengui myself, will pay you one million dollars! Whoever dares to sign this bet contract with me, it is still valid now."* Many Chinese have heard or viewed this \$1 million game. As it is so attractive to make big money easily, many Chinese signed this gambling deal with KWOK. It is no doubt that KWOK had made many people believe that SINO was an evil and should be killed or destroyed.

323. On **October 2, 2017**, KWOK invited some of his supporters, including Zhao Yan, Guo Baosheng, Zhuang Liehong, etc. to board on KWOK's yacht and had a cruise in Hudson River. Guo Baosheng made a video and posted on Youtube about their cruise. KWOK gave speeches to

¹⁷¹ <https://youtu.be/ky0MSSgzTQo>

¹⁷² <https://youtu.be/XvmlzNGWrVQ?t=1943>

¹⁷³ <https://youtu.be/DoN7AqqiQgA> (37:50-38:32)

the crowd, as shown in **Exhibit V-111**¹⁷⁴, wherein KWOK asserted that *"Mr. Zhao Yan, you are so cool today. I have promised you regarding Zhang Hongwei's issue. However, there are two prerequisites. First, you must accuse Wei Shi and SINO, You must do it."* Once Zhaoyan promised to do that, KWOK stated that *"Wei Shi and SINO must be sent to prison. You must be bravely. We are on the same boat. Zhao Yan, you must stand up to fight against Wei Shi and SINO, you must destroy SINO."* Many others on board expressed their anxious to destroy SINO. During their two hours cruise, KWOK's supporters spent lot of their time to discuss how to destroy SINO.

324. On **October 5, 2017**, SINO, along with his colleague Wei Shi, went to a news conference at National Media Club in Washington D.C. which was hosted by Bill Gertz¹⁷⁵. When SINO and Wei Shi showed up at the conference room, KWOK sent his security guards/aids, including Han Chunguang to harass SINO and Wei Shi. Once SINO and Wei Shi left the conference room at about 4PM, KWOK sent several of KWOK's supporters, including Guo Baosheng, Zhao Yan, and Fu Kewei, to follow SINO and Wei Shi. Guo Baosheng even had all of the stalking process live-streamed and made many people view it, as shown in **Exhibit V-112**¹⁷⁶.

325. Guo Baosheng and Zhao Yan both played key roles in KWOK's Endorsement Association and both received huge amount money from KWOK. These two guys had followed Plaintiff several times. They even took video while they were following SINO and Wei Shi, and then posted the video on the internet. That make plaintiff very paranoid and scared about his safety. Because KWOK had called up his supporters to destroy Plaintiff by following/stalking him, and KWOK has provided money to Guo Baosheng and Zhao Yan, KWOK should also take responsibility for such kind harassment.

326. KWOK not only sent his agents to follow Plaintiff, but also made videos for the whole stalking process and then posted it on web. Further, KWOK and his supporters would make video programs to describe how they follow Plaintiff and how their targets were scared. That sends a stronger threatening message: you are followed day and night, you have no way to go, and you

¹⁷⁴ <https://youtu.be/JzMO0cCCR54> (1:47-4:03)

¹⁷⁵ <http://www.yibaochina.com/article/Display?articleId=7435>

¹⁷⁶ <https://youtu.be/IkixGHIIdH4> (00:00-06:28)

will be eventually destroyed!

327. On **October 5, 2017**, as shown in **Exhibit V-113**¹⁷⁷, Guo Baosheng and Zhao Yan gave live-streamed chat on YouTube, wherein Zhao Yan first threatened LIU and SINO that *"Ah, Liu Gang, Ah, you just slapped yourself, you need to think about it. Just let you know that I went to gun stores and have guns now. My gun will be used for you and for SINO. We will see whether you dare to play the real game."* Zhao Yan threatened to kill LIU and SINO with his new guns.

328. In the same video as shown in **Exhibit V-113**¹⁷⁸, Guo Baosheng stated that *"They were so scared and started running away nervously when they saw I and Zhao Yan. Once they escaped to a corner, they thought that we were no longer to follow them. Later, he made a phone call and happened to turn head around, and then found that we were still following them, he and his attorney immediately made a turn. We continued to follow them. I saw them made another turn and went into a store, in fact, that is another door of the News Conference club. I also entered and continue to follow them."* It clearly stated how Guo Baosheng and Zhao Yan followed SINO and how SINO was scared.

329. While viewing the live-stream broadcasting, many KWOK's supporters sent messages to KWOK and Zhao Yan and wanted to help them to destroy SINO. Some viewers even asked Zhao Yan to catch and kill SINO. Some of SINO's friends or family members were so scared when they viewed that video. SINO's girl-friend was scared and had to be sent to hospital. In fact, KWOK's supporters repeatedly follow/threaten Plaintiff, and sometimes go to Plaintiff's home to harass them.

330. By posting the live-stream video to show their stalking process, KWOK and his supporters sent a message to Plaintiff and other Chinese dissidents to warn them that they were watched day and night!

KWOK Lured/Paid/Called for People to Harass/Defame Madia that Don't Support him

331. On **April 19, 2017**, VOA had a live-stream interview with KWOK. However, the

¹⁷⁷ <https://youtu.be/JaCuWjqnRew> (31:23 –31:37)

¹⁷⁸ <https://youtu.be/JaCuWjqnRew> (1:05:07–1:05:57)

broadcasting was ended in the middle due to some sensitive issues, for example, KWOK disclosed some individuals' passport information. KWOK's supporters gathered at the VOA building to protest VOA and request VOA to interview KWOK again. Since then, VOA became one of the media to be blamed/defamed by KWOK.

332. In or about **April 19, 2017**, Twitter, Facebook, and YouTube all blocked KWOK's accounts with these social media.¹⁷⁹

333. On **November 3, 2017**, Hudson Institute announced that the scheduled interview with KWOK on November 4, 2017 was suspended.¹⁸⁰

334. On **November 15, 2017**, LIU and SINO were invited by the Broadcasting Board of Governors (BBG) to do testimony about the dispute between VOA and KWOK, as shown in **Exhibit V-114**^{181 182}, wherein LIU and SINO expressed their supports to VOA, Twitter, Facebook and YouTube to block KWOK's accounts or to suspend interviews with KWOK to prevent him to disclose individual privacy information.

335. Because of their testimony at BBG, KWOK hated LIU and SINO even more and determined to destroy them. KWOK started a campaign to destroy/harass/defame Plaintiff and some of the media that didn't support him.

336. Since early 2017, KWOK had used Mingjing TV as his major platform for his "Exposure Revolution", which simply means to disclose privacy information of those targeted by KWOK. However, at the same time KWOK already had a plan to defame/destroy Mingjing TV. **Exhibit V-115**¹⁸³ shows a phone conversation between KWOK and Zhaoming which was recorded in or about April 2017, wherein KWOK stated that *"Mr. Zhaoming, you need to understand the strategy. Boxun is mainly targeting at foreign media platforms. You must remember that you need stand up. Do you know that Mingjing TV absolutely has background. That is why we shouldn't let Mingjing to sit large in the media platform."*

¹⁷⁹ <https://www.voachinese.com/a/guo-wengui-twitter-20170426/3826932.html>

¹⁸⁰ <https://www.rfa.org/mandarin/Xinwen/1-10032017143650.html>

¹⁸¹ <https://youtu.be/BkAxAWLjlsA>

¹⁸² <https://youtu.be/S9-o6Iro8og>

¹⁸³ <https://youtu.be/JDUY6KK55XE> (04:18-05:27)

337. Since November 2017, KWOK has publicly accused Ho Pin and Chen Jun, the two board members of Mingjing TV, to be Chinese spies and received money from Chinese spy agencies. In the **April 19, 2018** live-streamed video, as shown in **Exhibit V-116**¹⁸⁴, wherein KWOK asserted that *“Mr. Chen Jun had proved that they[Mingjing] had not only been BGYed, but also wanted to murder KWOK. Now everyone already understand that.”* KWOK even accused Mingjing sent Chen Jun to assassinate him.

338. On **May 15, 2017**, as shown in **Exhibit V-117**¹⁸⁵, inspired/sponsored by KWOK, Zhao Yan and Guo Baosheng led people to go to VOA building in Washington D.C. to protest VOA’s “4-19” cutting off interview with KWOK.

339. On **May 23, 2017**, as shown in **Exhibit V-118**¹⁸⁶, inspired/sponsored by KWOK, Zhao Yan and Guo Baosheng led people to go to VOA building in Washington D.C. to protest VOA’s “4-19” cutting off interview with KWOK.

340. Since June 2017, it has widely known that Wei Jingsheng had received large amount money from KWOK for protesting Interpol, then many people are anxious to do such kind protests and expecting to get money from KWOK. For example, Zhao Yan and Guo Baosheng repeatedly led people to do protests against VOA, Twitter, BBG, White House, General Attorney’s office, Facebook, Hudson Institute, wherever KWOK hate and wherever can draw attention to KWOK.

341. On **Sep 3, 2017**, as shown in **Exhibit V-119**, Guo Baosheng and Zhuang Liehong led Twitter Party to go to KWOK’s home to show their supports to KWOK. This event happened on weekly basis, and KWOK paid \$200 to each person each show up.

342. On **October 4, 2017**, as shown in **Exhibit V-120**¹⁸⁷, inspired/sponsored by KWOK, Guo Baosheng led some members of his Twitter Party to go to White House in Washington D.C. to protest VOA’s “4-19” cutting off interview with KWOK.

¹⁸⁴ <https://youtu.be/oocgnywUTtU> (5:58–9:24)

¹⁸⁵ <https://youtu.be/HdDxhAZOKIM> (0:00–0:10)

¹⁸⁶ <https://twitter.com/samuelchenny/status/866997199804260353>

¹⁸⁷ <https://twitter.com/milpitas95035/status/915640553831845888>

343. On **October 4, 2017**, as shown in **Exhibit V-121**¹⁸⁸, KWOK posted pictures which showed Guo Baosheng and Zhao Yan protesting outside the White House and stated that “My dear comrade brothers, I am extremely appreciate what you were doing for me and would never forget about your supports. Tomorrow, all of you are invited to the news conference. This is my invitation.” KWOK was using the pictures to call for his supporters to join the protests led by Guo Baosheng and Zhao Yan outside White House and VOA.

344. On **October 4, 2017**, as shown in **Exhibit V-122**¹⁸⁹, inspired/sponsored by KWOK, Zhao Yan and Guo Baosheng led some of KWOK’s supporters to go to Hudson Institute headquarters in Washington D.C. to protest its suspending the scheduled interview with KWOK.

345. In his **October 5, 2017** live-streamed video on YouTube, as shown in **Exhibit V-123**¹⁹⁰, Han Shangxiao shouted repeatedly “Hudson Scandal! Shame on you, Hudson!”

346. On **October 6, 2017**, as shown in **Exhibit V-124**¹⁹¹, inspired/sponsored by KWOK, Zhao Yan and Guo Baosheng led demonstration outside the Justice Department building to request asylum approval to KWOK.

347. On **October 31, 2017**, as shown in **Exhibit V-125**¹⁹², Guo Baosheng gave live-stream on YouTube to broadcast the demonstration outside the Twitter building for blocking KWOK’s account.

348. On **March 12, 2018**, KWOK published a video of recording himself to his “郭文贵” YouTube account, as shown in **Exhibit V-126**¹⁹³, wherein KWOK stated that “*Now I give my calls: Block all those who don’t reveal. Block those who don’t fight against State Thieves. Block Twitter. I urge you to block them immediately, right now! Block them immediately! Don’t view them! Don’t understand them! Never respond to them. Those garbage! They have nothing. They*

¹⁸⁸ <https://twitter.com/kwokmiles/status/915746377480724480>

¹⁸⁹ <https://twitter.com/zhaoyan818/status/915667964329910273>

¹⁹⁰ <https://youtu.be/P6JR0iTMT7k?t=1239>

¹⁹¹ <https://twitter.com/jj29350995/status/916641436635975680>

¹⁹² <https://youtu.be/JZcMUNPhUBg?t=955>

¹⁹³ <https://youtu.be/YUVkPrceYAM> (0:00–2:15)

are beggar! They have no food to eat! Dear comrade fighters, action, action, and action again! Block all those who don't reveal. Support those who do reveal. Support Lu De." KWOK called for his supporters to block all media that don't support him.

349. On **April 25, 2018**, Zhao Yan published a video of recording himself to his "Zhao Yan" YouTube account, as shown in **Exhibit V-127**¹⁹⁴, wherein Zhao Yan stated that *"My second question is whether your family had billion dollars business with the Education Department of China ("EDC") which is under controlled by the ex-premier Liu Yandong? One of your family members had business relations with EDC, including Peking University and various education organizations in Shanghai, and had over \$2 billion profits."* Zhao Yan accused Ms. Amanda Bennett, the president of VOA, was BGYed by the Chinese government.

350. On **April 25, 2018**, Zhao Yan showed up at the BBG meeting and tried to protest VOA again for cutting off interviews with KWOK, as shown in **Exhibit V-128**¹⁹⁵, wherein Zhao Yan stated that *"Why VOA fired 3 journalist, including Gong Xiaoxia, Dong Fang, and Li Su, right after they interviewed KWOK and the cutting off event?"* KWOK repeatedly accused that VOA had been BGYed by CCP. Zhao Yan just simply raised questions to BBG board members.

351. On **December 31, 2018**, Li Hongkuan showed up at a meeting held at the headquarter of the Chinese Democracy Party ("CDP"), as shown in **Exhibit V-129**¹⁹⁶, wherein Li Hongkuan criticized KWOK's exposure movements. That made KWOK very upset about Wang Juntao, the president of CDP, for not stopping Li Hongkuan's criticized speech against KWOK.

352. On **January 5, 2018**, as shown in **Exhibit V-130**¹⁹⁷, KWOK stated on Twitter that *"Frankly speaking, I am extremely disappointed to Wang Juntao's reactions. I had respected him very much previously. Based on what he had done, he was not a well educated gentleman. This is simply like someone cursed Wang Juntao in our Twitter Party, such as fuck his mother, fuck Wang Juntao, fuck Li Hongkuan's mother thousand times, fuck their sisters thousand times, fuck their*

¹⁹⁴ <https://youtu.be/GfWG2MqaD1g> (10:08-11:51)

¹⁹⁵ <https://youtu.be/3ljr8xHJy7M> (30:48--32:29)

¹⁹⁶ <https://youtu.be/3CLuDlu74Kc?t=11>

¹⁹⁷ <https://twitter.com/tearwallparty/status/949434092168257537>

ancestors thousand times. Were it happened, I would have stopped it and even punched him.”

KWOK called for people to accuse Wang Juntao and the CDP.

353. On **February 6, 2018**, as shown in **Exhibit V-131**¹⁹⁸, Sun Yan showed up at the headquarter of the CDP to make trouble and to retaliate CDP for allowing people to criticize KWOK. Sun Yan was inspired by KWOK and Zhao Yan to give trouble to people who were targeted by KWOK.

KWOK Sponsored Many Media Platforms to Harass/Defame People He Targeted at

354. In or about **May, 2017**, KWOK repeatedly contacted with Zhaoming to discuss recruiting fighters to help KWOK. Some of their conversations are recorded and are posted on YouTube, as shown in **Exhibit V-70**¹⁹⁹, where in KWOK told Zhaoming that *“Later on you should use another identity. I requested them. All of you must write articles, must stand up onto the platforms. People with better appearances should make live-streamed videos, and others must post articles. But the articles should be great articles rather than garbage articles. Then, they will not only be fans, but also be fighters.”* Here KWOK described his plan to build various media and let his fighters be trained to write various articles or show up on live-streamed videos.

355. On **December 12, 2017**, as shown in **Exhibit V-132**²⁰⁰, RFA reported that KWOK and Steve Bannon, the founder of Breitbart News, have met over 10 times within one month to discuss their businesses and will launch a new media platform. KWOK stated that *“I have money, you know that. I have a lot of money to do that.”*

356. Due to his malicious and abusive postings, social media such as Youtube, Twitter, and Facebook have blocked KWOK’s account for posting and limited his accounts’ functions. To continue his campaign against the Chinese dissidents, KWOK started to build his own media, GUO.MEDIA. Upon information and belief, KWOK invited Steve Bannon and Bill Gertz to be his partners in his new media, as shown in **Exhibit V-132**. KWOK stated that Steve Bannon had

¹⁹⁸ <https://youtu.be/HjGnV8vJrgM> (1:47-2:52)

¹⁹⁹ <https://youtu.be/iOt6tue7f8U?t=46> (0:44 - 1:13)

²⁰⁰ <https://www.rfa.org/cantonese/news/us-guo-12122017083940.html>

visited KWOK's apartment over 12 times within 2 months, and also met with Gertz frequently.²⁰¹

357. On **January 28, 2018**, as shown in **Exhibit V-133**²⁰², KWOK announced on GUO.MEDIA that *"Dedicated account registration will be available on GUO.MEDIA in one week. For each video which is qualified for supporting KWOK and against State thieves on GUO.MEDIA will be paid \$200. The top 10 selected by our comrades will receive \$50,000 to \$100,000 as award. Each VVIP member can have half hour to three hours live-streamed time. All will be paid in cash automatically after half hour uploading."* KWOK also repeatedly announced that for those who become a dedicated user of GUO.MEDIA could make over \$100,000 annually. That is very attractive to most people who want to make easy money.

358. On **March 5, 2017**, as shown in **Exhibit V-134**²⁰³, Guo Baosheng posted his first video to support KWOK. Later on he was sponsored by KWOK to be a full time KWOK's accomplice. Since then he has posted 576 videos to his "郭寶勝政論" YouTube account. At the same time, he also gave live-stream speeches on other media, such as GUO.MEDIA, Voice of Free China(自由中国之声), etc. He has worked on such kind videos nearly full time to post 2 videos each day in average. Most of his videos or interviews are helping KWOK to defame other people. By making videos to support KWOK, Guo Baosheng bought a half million dollar house with KWOK's money.

359. In **July 2017**, as shown in **Exhibit V-135**²⁰⁴, KWOK sponsored Pan Qing to turn his YouTube channel to be "Voice of Australia" (澳洲之声) to help KWOK to defame Chinese dissidents. Within the last 9 months, "Voice of Australia" has posted over 325 videos and most of them are just helping KWOK to spread lies or defame other people.

360. On **November 16, 2017**, as shown in **Exhibit V-136**²⁰⁵, KWOK sponsored to set up "自由中国之声频道" on YouTube. From November 23, 2017 to April 26, 2018, it has published 241

²⁰¹ <https://www.washingtontimes.com/news/2018/jan/4/drudge-exposes-bannons-new-benefactor/>

²⁰² <https://www.guo.media/likes.php?username=FreeForLife>

²⁰³ <https://www.youtube.com/user/minzhuparty/videos>

²⁰⁴ https://www.youtube.com/channel/UCGpW4aY5cul_vzMHeM9nrSQ/videos

²⁰⁵ https://www.youtube.com/channel/UC2ph-c4b5JnXVkJNeU_5_Xrg/videos

video on its “自由中国之声频道” on YouTube, roughly twice a day. Most of its Videos are about KWOK and helps KWOK to defame others.

361. On **December 16, 2017**, as shown in **Exhibit V-137**²⁰⁶, KWOK sponsored Guo Baosheng to set up “Voice of California”.

362. On **January 4, 2018**, as shown in **Exhibit V-138**²⁰⁷, KWOK sponsored Zhuang Liehong and Huang Ziyin to set up “Voice of North America”. Zhuang Liehong was paid \$4,500 monthly. Within the last three months, “Voice of North America” has posted 90 videos and all of them are just helping KWOK to defame other people.

363. On **March 4, 2018**, as shown in **Exhibit V-139**²⁰⁸, KWOK sponsored Sara to set up “郭友之声” on YouTube. Within less than one month, this account had 4K subscribers and 170K views. From March 4 to April 4, 2018, “郭友之声” has published 108 videos to its YouTube account, and most of them are simply circulating lies and faked documents created by KWOK. In average, it posts 4 videos on daily basis.

364. On **March 27, 2018**, as shown in **Exhibit V-140**²⁰⁹, KWOK sponsored Lu De to set up “路德访谈” channel on YouTube. Within less than one month, his account had 26,835 subscribers and 1,433,538 views. From Mar 27 to May 5, 2018, Lu De has published 80 videos to his “路德访谈” YouTube account, and most of them are simply circulating lies and faked documents created by KWOK. In average, Lu De posts 2 live-streamed videos.

KWOK Sponsored Chariot Parade to Show Power and to Intimidate Others

365. Armed with weapons, Mercedes cars, Combat Suits, supporting media, and money provided by KWOK, KWOK’s supporters were ready to do whatever KWOK asked them to do. For Example, KWOK and his supporters repeatedly do Chariot Show Parade in some big cities.

366. On **March 3, 2018**, as shown in **Exhibit V-141**,²¹⁰ Lu De live-streamed interviewed

²⁰⁶ <https://www.youtube.com/watch?v=oHnGKgSjIZk&t=229s>

²⁰⁷ https://www.youtube.com/channel/UCI5taPPgm-Ldfw_31864b7w/videos

²⁰⁸ <https://www.youtube.com/channel/UCNKpqIqrErG1a-ydQ0D5dcA/videos>

²⁰⁹ <https://www.youtube.com/channel/UCm3Ysfy0iXhGbIDTNNwLqbQ/videos>

²¹⁰ <https://youtu.be/eree5GtKYzI> (0:00-6:03)

one of the KWOK's Chariot Show Parade in South California. When asked who provided funds to their parades, one of the organizers for the parade stated that *"A few days ago, KWOK sent \$3,000 to our bank account, and we have spent one or two thousands for this parade."* It is KWOK who provided funds to organize the Chariot parade to support himself!

367. The parades are held on weekly basis in New York, Tokyo, Taipei, London, and other cities, as shown in **Exhibit V-142**²¹¹, and **Exhibit V-143**²¹².

368. The chariot parades were compared with Hitler's parade whenever Hitler invaded/occupied another country, especially the parade for Hitler's 50th Birthday on **April 20, 1939**, as shown in **Exhibit V-144**²¹³. KWOK's Chariot parade is simply a simulation or copy of the Hitler's 50th Birthday Parade on **April 20, 1939**.

369. KWOK was extremely excited about the Chariot parades, and he highly praised that the parades had increased morale of our comrade fighters, and destroyed the prestige of the 8 Weilei's. KWOK's chariot parades are simply a show to demonstrate his power and money, and to have his targets/enemies scared, and thus would eventually destroy the 8 Weilei, including Plaintiff, mentally and psychologically. KWOK repeatedly stated that he wanted to send Plaintiff into prison, and would destroy Plaintiff by making him sleepless. The chariot parade is simply another psychological war against Plaintiff and other Chinese dissidents.

KWOK Intimidated Plaintiff by Showing off His Relationships with Powerful Figures

370. KWOK believes that even political figures or journalists or prosecutors can work for him as long as he wants. The only problem is how much money KWOK would like to pay. For example, Tony Blair (Ex-Prime Minister of Britain), Steve Bannon (served as White House Chief Strategist), Bill Gertz (Columnist and reporter of The Washington Free Beacon and The Washington Times), Mike Forsythe (New York Times reporter), and Charlie Rose (Anchor of CBS and PBS) have all met/interviewed KWOK or helped KWOK to create/spread fake news.

371. KWOK frequently show off that he had good relationship with some of the American

²¹¹ <https://youtu.be/9Ar1WnkuzOM> (0:00-0:40)

²¹² <https://youtu.be/r6Sy2OhI2I0>

²¹³ https://youtu.be/Gu5u_QrsWO0 (2:38-3:02)

political figures or powerful people, including President Trump. By showing off pictures that he had with some of the powerful people, KWOK threatened that those powerful public figures could help him to send Plaintiff and other Chinese dissidents into jail even in USA, just like what he had done in China with some of Chinese big figures or spy agents as back forces.

372. On **November 22, 2017**, as shown in **Exhibit V-145**²¹⁴, KWOK asserted on Twitter that *"President Trump just posted a new twits with this Mar a Lago photo attached! I strongly believe that he enjoyed his Mar-a-Lago more than White House.... He treats his members much better than before. His members are proud of him with humble and professional. Recently, there are many Chinese and people from Hong Kong and Taiwan wanted to be members of Mar-a-Lago, but all of them have been rejected, due to afraid of "BGY" program. That is wonderful thing of Americans. I am so appreciate that they [President Trump] treat me and my family so well!"* KWOK always showed off that he had paid large amount membership fee to Mar-a-Lago, thus President Trump would treat him as a brother, and would definitely help him whenever he asked for. This kind statements made Plaintiff very nervous and were so afraid to be persecuted by Trump's administration.

373. On **August 18, 2017**, a video was posted on YouTube by YouTube account "RLRPG RLRPG", as shown in **Exhibit V-146**²¹⁵, wherein KWOK complained against President Trump and stated that *"Trump is very cunning and could never be trusted. He always breaks his promises, even break the signed contracts."* KWOK implied that President Trump had signed some contracts with KWOK, and promised to do something for KWOK. However, KWOK hadn't got what he had expected from Trump.

374. On **March 9, 2017**, KWOK posted several photos that he had taken with Bernd Lembcke, the General Manager of Mar-a-Lago, as shown in **Exhibit V-147**²¹⁶, wherein KWOK stated that *"Bernd Lembcke, one of the most trusted aids of President Trump and had served for*

²¹⁴ <https://twitter.com/kwokmiles/status/933512407099592704>

²¹⁵ <https://www.youtube.com/watch?v=SPVGPbG4Pxo> (0:05-0:34)

²¹⁶ <https://twitter.com/KwokMiles/status/839993956377251840>

Trump for over 33 years, manages the Mar-a-Lago for President Trump. He is a gentleman and treats me extremely good.”

375. On **April 18, 2018**, KWOK posted several photos that he had taken in one of the room in Mar-a-Lago club in which President Trump just met with the Japanese Prime Minister Shinzō Abe, as shown in **Exhibit V-148**^{217 218}. Then KWOK’s supporters, such as Zhaoming, propagated that KWOK just met with President Trump and Shinzō Abe. That is a Chinese type trick of double play game. KWOK and Zhaoming repeatedly apply this kind trick to fool people to believe that KWOK was powerful.

376. In the **April 19, 2018**, live-streamed interview with Lu De, as shown in **Exhibit V-149**²¹⁹, wherein KWOK responded to a question about whether he had met President Trump and Mr. Abe and stated that *“Have I met them? I can’t say yes nor no, because I can’t lie about it and I was required to keep quiet about it. So, I can’t tell whether I met or not. Thank you for your concern. You will know the answer soon or later.”* KWOK was trying to fool people by implying that he had met with President Trump and Mr. Abe.

377. In the **April 19, 2018**, live-streamed interview with Lu De, as shown in **Exhibit V-150**²²⁰, wherein KWOK stated that *“60 thousand exiled Chinese would be deported to China immediately. Among them, there are 100 very important persons. Most of them are against KWOK. Many people who are against KWOK are on the list. If I were deported, those who are against KWOK would not need to oppose KWOK, instead they will be sent to prison directly. Think about it. How terrible it would be.”*

378. On **January 2, 2018**, a video was posted on YouTube, as shown **Exhibit V-151**²²¹, wherein several New York Times reporters who had interviewed KWOK were talking about how KWOK tried to fool them by pretending that he was frequently speaking to Xi Jinping directly.

²¹⁷ <https://twitter.com/ZhaoMingObserve/status/986560791485665280>

²¹⁸ <https://twitter.com/ZhaoMingObserve/status/986878160825237504>

²¹⁹ <https://youtu.be/O8J98tRNR7M?t=759> (12:39-13:50)

²²⁰ <https://youtu.be/8ygmVvWhzVs?t=413> (6:53 - 8:29)

²²¹ <https://youtu.be/jU4YKymjP94>

379. On **January 20, 2017**, President Trump appointed Steve Bannon to be his Chief Strategist, a newly created position. However Bannon's employment in the White House ended on **August 18, 2017**.

380. On **January 4, 2018**, the Washington Post reported that *"Steve Bannon finding opportunity and happiness in the arms of a new billionaire benefactor, Miles Kwok. Mercer is yesterday's mashed potatoes..."* Bannon found KWOK as his new benefactor.

381. On **October 10, 2017**, as shown in **Exhibit V-152**²²², KWOK stated on Twitter that *"Mr. Bannon has contacted with me through friends in the last 6 months, however, we haven't met yet until October 5 we met at the Washington news conference. I asked Mr. Yang Jianli, Bill Gertz, and Mr. Bannon to have lunch in my room. All of us are extremely excited. Today, October 10, Mr. Bannon and his team came to my home in New York and we had a 3.5 hours dinner! The attached photos are agreed by Bannon's team to disclose to our comrade fighters."* KWOK was trying to show off his intimate relationship with Bannon and let people know that Bannon was his umbrella and would protect him, just like what Ma Jian had done for him.

382. On **October 18, 2017**, as shown in **Exhibit V-153**²²³, KWOK stated on Twitter that *"I have been busy all day and haven't slept for over 40 hours. I just met and had meetings with Mr. Bannon and his team all this afternoon. I have learned a lot from him. He is honest and a patriot. He was worrying about the security of the USA and tried to gather relevant information. I extremely admire him. We have a lot of things in common including goals and opinions. Both of us are extremely angry about that the relationship between China and USA could be damaged by the State thieves. Worrying!"* It sounds like a meeting between top leaders of intelligent agencies to discuss relationships and security issues between China and USA. KWOK showed off that he had exchanged sensitive information with Bannon.

383. On **November 22, 2017**, as shown in **Exhibit V-153**²²⁴, KWOK stated on Twitter that

²²² <https://twitter.com/kwokmiles/status/917957848612655105>

²²³ <https://twitter.com/kwokmiles/status/920791430012063744>

²²⁴ <https://twitter.com/kwokmiles/status/920791430012063744>

"Hello, My dear comrade fighters. Thanks to Twitter for having my Twitter account recovered. However, the live-stream function is still limited now. I have missed you all. I met Mr. Bannon the 8th times yesterday at my home. He has taught me a lot especially in media business. We will further discuss our business collaborations, especially about the media business in western countries. Everything is just beginning!" KWOK invented the word BGY and used to accuse others were BGYed by CCP. Being the new benefactor of Bannon is exactly a BGY trap targeting at Bannon.

384. Washington Post commented on these KWOK's tweets as: *The tweet shows a picture of Bannon smiling with a gentleman Drudge identifies as "Miles Kwok aka Guo Wengui."* The tweet is classic Drudge with his trademark wit: *"Steve Bannon finding opportunity and happiness in the arms of a new billionaire benefactor, Miles Kwok, aka Guo Wen Gui. Mercer is yesterday's mashed potatoes..."*, as shown in **Exhibit V-155**^{225 226}.

385. Bannon visited KWOK's home to have dinner with KWOK nearly twice a week! That frequency is something like Tony Blair used to travel on KWOK's private jet and be served by beautiful women provided by KWOK. While in China, KWOK used to use Chinese intelligent agencies, such as MSS and GHID, as his back forces, and Chinese powerful officials as his umbrella to put other people into jail. Now in the United States, KWOK tried to use President Trump as his umbrella, and expected Bannon to play the role that Ma Jian used to play.

386. On **June 14, 2017**, as shown in **Exhibit V-156**²²⁷, KWOK posted a photo of himself with his private attorney David Boies standing shoulder by shoulder and stated that *"this is my private attorney and one of my best friends. He is a super power lawyer and has won many world class cases, including Microsoft, Bill Gates, AIG related cases."* With Boies as his attorney, KWOK always boasted that no one could beat him, and he could send anyone into prison through the judicial systems of the United States, and KWOK repeatedly stated that his attorneys could

²²⁵ <https://www.washingtontimes.com/news/2018/jan/4/drudge-exposes-bannons-new-benefactor/>

²²⁶ <https://www.washingtontimes.com/multimedia/image/screenshot-199png/>

²²⁷ <https://twitter.com/kwokmiles/status/875012859582976000>

easily send SINO and LIU into prison. These statements made Plaintiff very nervous for being arrested through false accusations.

387. On **March 5, 2017**, as shown in **Exhibit V-157**²²⁸, KWOK posted several photos of Robert S. Tucker and Duncan Levintwits and stated that *"these two ex-federal-prosecutors will definitely send Wei Shi, SINO, and their bosses into prison!"*

388. On **March 6, 2017**, as shown in **Exhibit V-158**²²⁹, KWOK posted several photos of Robert S. Tucker and Duncan Levintwits and stated that *"I just had toast with these two ex-federal-prosecutors. After we discussed my cases against SINO and Wei Shi, I just found out that Robert used to be a prosecutor in Flushing, whereas the current active prosecutor in Flushing was an apprentice of Robert."* KWOK clearly implies that these two U.S. attorneys are playing the role of Ma Jian and Zhang Yue used to play—they have the power to help KWOK to send anyone into jail as long as KWOK requested. To convince people to believe him, KWOK also attached several intimate photos wherein the two ex-prosecutors kissed KWOK on his cheeks, and behaved like two Barbie doll servants of KWOK's. Some of KWOK's supporters commented on these photos and these two ex-prosecutors: *"Money can make a ghost. It is true everywhere."*

389. Whenever KWOK showed off such kind photos, his supporters/fans would be so excited and many of them would write comments, such as: "Support KWOK!" "Bannon is the Greatest American!" "Send SINO into jail and die in jail!" "Send the 8 Weilei to Hell!" "Kill Liu Gang!"

Gertz Helped KWOK to Spread Forged Documents and Faked News

390. Bill Gertz is another powerful figure, extremely influential in media. KWOK has frequently met Gertz since July 2017. Gertz is an example to show how KWOK used big figures to spread lies and fake news, and some of the lies are further used by KWOK to hurt Plaintiff.

391. On **July 11, 2017**, Gertz published an article on The Washington Free Beacon, as shown

²²⁸ <https://twitter.com/kwokmiles/status/838306647843958784>

²²⁹ <https://twitter.com/kwokmiles/status/838896743131545604>

in **Exhibit V-159**²³⁰, which stated that *“Beijing’s spy networks in the United States include up to 25,000 Chinese intelligence officers and more than 15,000 recruited agents who have stepped up offensive spying activities since 2012”*, and stated the source was from KWOK. It might be true, but cannot be validated from other sources. Then KWON used this article to accuse LIU and SINO were among the 15,000 Chinese spies, which is definitely a lie and defamation against Plaintiff.

392. On **September 29, 2017**, Gertz published an article on The Washington Free Beacon, as shown in **Exhibit V-160**²³¹, which stated and circulated many lies made up by KWOK.

393. For example, it stated that *“The asylum document revealed that Guo supported the pro-democracy protesters in Beijing’s Tiananmen Square in 1989 by selling his motorbike and giving the money to the protesters, who were brutally suppressed by Chinese troops. Guo was initially charged with counter revolutionary activity that was later changed to financial fraud resulting in his imprisonment for 22 months.”* These statements cannot be verified from other sources. Actually, KWOK has never been charged with counter revolution in China. There are no evidences to show KWOK had been involved in Tiananmen Square pro-democratic movement in 1989. Instead, there are evidences to show that KWOK was jailed before that movement started. What Gertz stated about KWOK was definitely not true. By publishing this article, Gertz is using his power to help KWOK speculating lies and let KWOK used such kind faked documents as evidences for his asylum application.

394. The article stated that *“Beijing offered to release his family members and employees from prison and unfreeze assets in China worth about \$70 billion”*, while KWOK also stated he had \$30 billion outside China, which means KWOK should have doubled what Bill Gates has. It is unbelievable.

395. The article also stated that KWOK was cyber-attacked by some Twiter users, especially

²³⁰ <http://freebeacon.com/national-security/chinas-spy-network-united-states-includes-25000-intelligence-officers/>

²³¹ <http://freebeacon.com/national-security/fbi-eyes-china-posting-hacked-documents-chinese-dissident/>

by “Spectre” (@twiSpectre), the temporary steering loss was part of a Chinese electronic attack, “23 of sensitive information likely stolen during the hack of the law firm and in particular, Guo's lawyer Thomas Ragland.” All these statements cannot be validated and sound like made up stories. How can KWOK find out 23 electronic documents were stolen? The number 23 here looks like a magic number!

396. Gertz also cited KWOK's allegations in his article: “KWOK also has revealed data on China's large-scale intelligence operations in the United States that have been conducted by more than 25,000 Chinese agents. The information was based on KWOK's ties to former Ministry of State Security Vice Minister Ma Jian, who was caught up in Xi's anti-corruption campaign and imprisoned”.

397. Gertz described KWOK as a victim of Chinese spies and cyber-attack hackers. Gertz didn't mention who were the offenders. However, KWOK tells people who did the Cyber attack – he fingers at Plaintiff and other Chinese dissidents and accused them to steal electronic documents from his computer through cyber-attacks.

398. In his **December 23, 2017** live-streamed video, as shown in **Exhibit V-30**²³², KWOK stated that “*whoever visit Boxun, your personal information would be stolen, and Boxun can automatically figure out whether you have any relationship with KWOK. Once our GUO.MEDIA starts to operate, I will show you how Boxun and Duowei take advantage of the highly developed software to collect your personnel information.*” KWOK claimed it was Boxun who had cyber-attacked his computer.

399. In his **December 23, 2017** live-streamed video, as shown in **Exhibit V-65**²³³, KWOK stated that “*SINO is a suspect of theft through cyber-attacks, unregistered agent who espionage for China in USA, sexual harass females, raping, created faked documents, the lawsuit is under processing. Shit NUO is the most evil I have ever seen. To call him shit is a insult to shit. Let's see how long you can survive. You steal documents through cybaer-attack, you are hacker.*” KWOK

²³² <https://youtu.be/OAq2aGC3MrQ> (52:36–53:58)

²³³ <https://youtu.be/OAq2aGC3MrQ> (52:36–56:40)

claimed it was SINO who had cyber-attacked his computer.

400. In the same video as shown in **Exhibit V-65**, KWOK also stated that *“Liu Gang, you madman, you are suspects of extortion, create faked documents, rape and harass females, the lawsuit against you is under processing. You can no longer pretend to be madman. I will change you back to normal person. Liu Gang, you can cheat others easily. Let’s see, your raping activities, you raped others right in a car, then intimidate the victim.”* KWOK claimed it was LIU who had cyber-attacked his computer and created faked documents.

401. Based on what KWOK did to Boxun in January 2015, as shown in **Exhibit V-23** and **Exhibit V-27**, it is KWOK himself always does cyber-attacks against Boxun and SINO, and then threatened other people to be scared to visit Boxun. Once SINO reported to FBI about KWOK’s criminal activities, KWOK, with helps of Gertz, false accused SINO for cyber-attacking KWOK’s computer and his yacht!

402. On **November 1, 2017**, Gertz even hosted a press conference for KWOK, as shown in **Exhibit V-161**²³⁴, wherein KWOK showed several “secret documents”, including the one titled *“CCP sent He Jianfeng and other 27 Chinese secret police officers to the United States”*. Most of Chinese believed that this document is a faked and created by KWOK or his team. Even if it is true, there is no any value and cannot be validated. This faked document was used by KWOK as an evidence to accuse Plaintiff and other Chinese dissidents were Chinese spies.

403. On **January 2, 2018**, Gertz published an article on The Washington Free Beacon, as shown in **Exhibit V-162**²³⁵, wherein another CCP confidential document provided by KWOK was included, which stated that *“Secret document reveals China covertly offering missiles, increased aid to North Korea.”* Many Chinese had pointed out several typos in that file, it typed “对峙” instead of “对持”, which normally cannot happen in a CCP’s secret document. Regardless the content is true or not, the formats and the tone are not look like a CCP’s secret document. Instead, it is more like KWOK’s style.

²³⁴ <https://youtu.be/mmNKiHEMwJ4> (11:29 —15:20)

²³⁵ <http://freebeacon.com/national-security/secret-document-reveals-china-covertly-offering-missiles-increased-aid-north-korea/>

404. On **March 28, 2018**, Gertz published another article on The Washington Free Beacon, as shown in **Exhibit V-163**²³⁶ ²³⁷, wherein Gertz stated that *“Liu Xiaobei heads China’s U.S. hacking operation, and the activities of one of China’s cyber spymasters has been revealed for the first time in a government report on Beijing’s unfair trade practices made public last week.”* Again, Gertz reported a news without any credential sources and cannot be verified. The only source is KWOK. In short, what KWOK wants to tell people is: Liu Xiaobei is responsible for all cyber-attacks, whereas KWOK has never done any cyber-attacks.

405. KWOK, through Gertz, repeatedly made up this kind fake news, and then used Gertz’s credits to spread his lies, and used Gertz articles to accuse others to be Chinese spies and have done cyber-attacks against him. What KWOK and Gertz have done are something similar to typical Chinese style spy tricks: “瞒天过海”(fool the emperor to cross the sea), “偷梁换柱”(replace the original with a fake), “借刀杀人”(kill someone with a borrowed knife), whereas Gertz was fooled and used as the borrowed knife.

406. Gertz was cheated/used/fooled by KWOK as his borrowed knives to destroy other people including Plaintiff. How Gertz is used? KWOK fed Gertz with some faked documents or faked news. Then Gertz tells the first part of the lie, such as “KWOK was cyber-attacked”, “China sent 27 spies into USA”, etc. Lastly, KWOK tells second part of the lie, such as “who cyber attacked KWOK”, “LIU and SINO are among the 27 spies sent by China.”

407. KWOK can fool Gertz and Bannon to be his borrowed knives, but he cannot fool everyone. Roger Stone posted some videos on the YouTube account “The Alex Jones Channel”, and had talked about KWOK and Bannon, as shown in **Exhibit V-164**²³⁸, wherein Roger Stone just tells some of his comments and opinions about KWOK.

408. However, KWOK immediately responded with lawsuit against Roger Stone, which asked \$100 million for compensation, as shown in **Exhibit V-165**²³⁹. That shows KWOK’s rule:

²³⁶ <https://twitter.com/BillGertz/status/979393090254405632>

²³⁷ <https://www.washingtontimes.com/news/2018/mar/28/liu-xiaobei-heads-chinas-us-hacking-operations/>

²³⁸ <https://www.youtube.com/watch?v=hRyNOTSU0d4>

²³⁹ <https://theblast.com/roger-stone-sued-defamation-infowars/>

he should have the rights or authorities to curse others on daily basis, but no one can comment on him negatively. Otherwise he would start unrestricted legal war to destroy whoever had ever criticized him.

409. There are Chinese idioms called “贼喊捉贼”(the thief cries thief) and “恶人先告状”(the guilty party files the suit). That is what KWOK used to do. KWOK is an elite Chinese spy, but he reported to FBI that SINO and LIU were Chinese spies. KWOK ordered cyber-attacks against Boxun and SINO, but he accused SINO and LIU cyber-attacked his computer and yacht! KWOK paid people to create faked CCP secret documents, but he accused LIU and SINO created faked documents to do extortion.

410. By applying his spy skills and resources, KWOK has not only looted and persecuted people in China, but also started to do it in the United States. He is not only targeting at Chinese dissidents, but also targeting at anyone who have say “NO” to him. He is not only abusing Plaintiff and some Chinese dissidents, but also abusing the judicial system of the United States.

KWOK Built up Gangster-Like Organizations to Destroy Plaintiff and the 8 Weilei

411. KWOK has a discrimination belief based on wealth/health/sperm/appearance. KWOK and his supporters propagate that kind belief and generate hates against poor/disabled people.

412. Based on his discrimination belief, KWOK along with his supporters or followers set up several gangster-like organizations, such as “KWOK Fan Club”(郭后援会), “KWOK Endorsement”(挺郭会), “Twitter Party”(推特党), “Himalaya Family”, “Little Ants”, etc.. KWOK always claimed that he had over millions supporters. KWOK gave strict doctrine, missions, and objectives to members of his organizations.

413. On **March 11, 2018**, KWOK published a video recording of himself to his “郭文贵” account on GUO.MEDIA, as shown in **Exhibit V-69**²⁴⁰, wherein KWOK cursed and defamed Plaintiff and other Chinese dissidents with very dirty words, such as *“they had a pity and poor life compared with KWOK”, “their life is worse than my driver”, “stinky beggar”, “poor than my night stool”, “owe a butt debt”, “shameful, sad, poor”, “I will fix you all”, “even can’t*

²⁴⁰ <https://youtu.be/avx-CFw7ro> (0:34 – 1:39)

support his wife, children”, “have no capability to make big money”, “they are mental illness judged by judges”, “they are not worth to live in this world”, “they did nothing in the last 28 years”, “they sell their wives and mothers on street”, etc.. KWOK judges whether people have right to live simply based on their amount of wealth, the quality of gene/sperm, health, and appearance! Based on his discrimination belief, KWOK incited hatred against the poor, especially the Chinese dissidents, and called for his supporters to destroy the people whoever he hated or listed on his most wanted list, including Plaintiff.

414. On **February 23, 2018**, KWOK published a video recording of himself to his “郭文贵” account on GUO.MEDIA, as shown in **Exhibit V-54**²⁴¹, wherein KWOK stated that *“Hello, my dear comrades-in-arms, here are two of half million dollar remittance that have just been transferred to KWOK Fan Club in Australian. This is the administrative expenses for Zhao Ming and the Australian KWOK Fan Club. If not enough, I have 10,000,000 US dollars ready to pay! The troubles of any member of the KWOK Fan Club is the problems of the whole KWOK Fan Club. KWOK Fan Club is a Himalayan family that surpasses money, sex, power, and honor! KWOK will serve his life and everything to this family! Everything is just beginning.”* KWOK repeatedly warned his followers to fight together for their Himalaya family.

415. KWOK’s organization is none other than cult organization: it has strict doctrine; all members must be absolutely loyal to KWOK; make money unscrupulously; promise to earn big money once to be a loyal member; encourage its members to have weapons; etc. KWOK repeatedly requested his followers/supporters to follow these rules or doctrines.

416. KWOK not only harassed/defamed Plaintiff by, but also requested/paid/encouraged his gangster members to threaten/harass/assault Plaintiff.

417. On **November 15, 2017**, LIU and SINO were invited by the Broadcasting Board of Governors (BBG) to do testimony about the dispute between VOA and KWOK, as shown in **Exhibit V-114**^{242 243}, which made KWOK very upset and KWOK repeatedly called for his

²⁴¹ <https://youtu.be/lUOdsDtWi08> (0:00–0:43)

²⁴² <https://youtu.be/BkAxAWLjlsA>

supporters to defame LIU and SINO.

418. On or around **November 18, 2017**, KWOK published a video of recording himself to his “郭文贵” YouTube account, and then republished on YouTube by many of his supporters, as shown in **Exhibit V-166**²⁴⁴, wherein KWOK stated that *“The most ridiculous thing is, BBG invited them a few days ago. I told some of American law makers that you invited an madman to do testimony, his name is Liu Gang, and he is mentally silly and a psychiatric patient. That is a tragedy of the USA. They were so shocked. I asked them to check his profiles and told them that he was filed lawsuits many times, and is a madman judged by the court. He is a psychiatric patient and need to take medicine.”*

419. KWOK defamed each of the 8 Chinese dissidents again including Plaintiff, to be rapist, mentally ill, schizophrenia. KWOK clearly stated that he had convinced some Congress members or Senators to believe LIU was crazy/silly/insane. This shows that KWOK had tried his best to defame LIU and destroy LIU’s network. KWOK also stated that Plaintiff and the 8 Chinese dissidents all together had much less money than his son could make within just one month. That shows KWOK hate Plaintiff because Plaintiff is poorer than his son. KWOK believes that poor people don’t have rights to live in this world, and should be humiliated and even destroyed.

420. Inspired by KWOK, many of his supporters posted video or written statements to defame/harass Plaintiff.

421. For example, On or around **November 18, 2017**, Han Shangxiao published a video of recording himself to the “澳洲之声” YouTube account, and then republished on YouTube by many of his supporters, as shown in **Exhibit V-167**²⁴⁵, wherein Han Shangxiao stated that *“Shame on the two rogues who gave testimony against KWOK at BBG! Regarding this leader of Tiananmen Pro-democracy movement, it made me extremely shocked that many friends on Twitter simply amused his countable hair on his bold head. It is true that the countable hair on his head is extremely ugly, however, you all forget that his heart is more dirty, his soul is more dirty and*

²⁴³ <https://youtu.be/S9-o6Iro8og>

²⁴⁴ https://youtu.be/m3z_n3JMLxo (21:23–2:13)

²⁴⁵ <https://youtu.be/55OLPwY9vLU> (0:00-0:45)

more disgusting. In a country with freedom of speech such as USA, how can he request BBG to block KWOK, because KWOK has abused freedom!" Han Shangxiao just repeated the defamation statements against LIU and SINO given by KWOK.

422. There are hundreds comments given by KWOK's supporters to the above mentioned video on YouTube. **Exhibit V-167** also lists two pages of those comments which simply curse Plaintiff with very dirty words that frequently used by KWOK to accuse Plaintiff, such as "Shit SINO", "Anus LIU", "LIU is a madman", "LIU is mentally disabled", "Two Weilei", "Two Scums", "Lets kill these two Bitches", etc.. All these dirty words are first used or frequently used by KWOK to defame LIU and SINO. That tells how many people hate and want to kill LIU and SINO just because KWOK's misleading and defamation statements.

423. Since **November 28, 2017**, some artists even posted many cartoons to defame Plaintiff and other Chinese dissidents. For example, as **Exhibit V-168**^{246 247 248}, 阿平漫画("Aping") created and posted on Twitter several cartoons to defame the 8-Weilei and then asked KWOK to sponsor him to create more such kind defamation arts. This shows that KWOK had lured/paid many people to harass/defame Plaintiff.

424. On **April 14, 2018**, in a live-streamed chat with Guo Baosheng, as shown in **Exhibit V-169**²⁴⁹, Zhao Yan asserted that *"Ah, stab the anus with a bayonet, stab anus of LIU's. Oh, should stab Shit SINO's. The previous time was Li Hongkuan. Liu Gang, Yang Jianao is not afraid of you. You can bring Shit SINO and Eunuch Chen with you to meet me. I and Guo Baosheng will teach you a lesson tonight. And we can meet and talk next week."* And then Guo Baosheng added that *"LIU Gang was issued a certificate of mental illness by hospitals. On the other hand, he didn't pay Child support to his son, it has been two years. I was told that he was living in shelter sponsored by the government. He lives in shelter for homeless. As a master of Peking University, He lives in shelter for homeless of the United States. Too shame! Too shame. KWOK told us all*

²⁴⁶ <https://twitter.com/apinkcartoon/status/935741272555433984>

²⁴⁷ <https://twitter.com/apinkcartoon/status/935831899188051969>

²⁴⁸ <https://twitter.com/apinkcartoon/status/955693611206656001>

²⁴⁹ <https://youtu.be/9FsBOgtXUaU> (0:34-0:41) (27:07-27:40) (28:17-29:16)

these ugly things about these Weilei."

425. On **April 25, 2018**, in a live-streamed video, as shown in **Exhibit V-170**²⁵⁰, Zhao Yan stated that *"BBG didn't allow me to register when it had meeting last January, but they made it a farce. Liu Gang, a garbage in homeless shelters with a few hair on his head, and Shit SINO, who was spitting shits all the time from his mouth, both of them were cartooned by Aping, and both of them were talking bullshits at the BBG meeting and try to fawn Amanda and John."*

426. On **April 25, 2018**, in a live-streamed chat with Sun Yan, as shown in **Exhibit V-171**²⁵¹, Zhao Yan stated that *"Fang Jue, accompanied by Liu Gang, are living in shelters for homeless in USA. Both of them are well educated, especially Liu Gang is very skillful, why they don't have a job? Why had he had to live like a son of bitch on SINO? Just because he doesn't have morality."* And then Sun Yan added that *"That is true. He is too lazy."*

427. On **May 2, 2018**, in a live-streamed chat with Sun Yan, as shown in **Exhibit V-172**²⁵², Zhao Yan stated that *"Both Liu Gang and Fang Jue are graduates of Peking University. Now both of them lives in shelters for homeless in USA. He lives in shelters. That is too shame."* And then Sun Yan added that *"That is true. He is too lazy."*

428. On **April 25, 2018**, in a live-streamed video, as shown in **Exhibit V-113**²⁵³, Zhao Yan asserted that *"Liu Gang, Ah, you just slapped yourself, you need to think about it. Just let you know that I went to gun stores and have guns now. My gun will be used for you and for SINO. We will see whether you dare to play the real game."* Zhao Yan clearly stated he just purchased guns and will use his guns against LIU and SINO whenever he met them again. That is just what KWOK asked and paid him to do!

429. KWOK promised to pay his supporters \$200 for each video or article as long as it speaks out for KWOK. Encouraged or requested by KWOK, Zhao Yan, Guo Baosheng, Zhaoming, Xiang Lin, Yuan Hongbing, Zhuang Liehong, Wuting, along with many other

²⁵⁰ <https://youtu.be/GfWG2MqaD1g> (7:57-8:51)

²⁵¹ https://youtu.be/UHBYg0F4_I (1:25:03-1:28:22)

²⁵² <https://youtu.be/iwde-ivCn18?t=1410> (23:30-24:10)

²⁵³ <https://youtu.be/JaCuWjqnRew> (31:23-31:37)

KWOK's supporters, posted videos or articles to repeat KWOK's false accusation against Plaintiff almost on daily basis. Many other KWOK's supporters are encouraged/incited/forced by KWOK to denounce/threaten/follow Plaintiff. KWOK always curses Plaintiff with dirty words, such as KWOK calls LIU as "瘤肛"(Assholes LIU), SINO as (稀屎诺) Shit Sino, and call all the 8 Chinese dissidents as "痔疮"(Assholes Acne), "癞蛤蟆"(toad), "乱伦"(incest), etc. Influenced by KWOK, most of Chinese believed that LIU and SINO were evils and would always call them as "Assholes Acne" or "Shit Sino".

Lured by KWOK's Award, Some of His Accomplices Tried to Attack LIU and SINO

430. KWOK publicly announced that he would pay \$100,00 to anyone who would false accuse the 8 Weilei, including Plaintiff. KWOK also stated that he had set \$50 million as funds to destroy 8 Weilei. That award is very attractive, especially to those who had criminal records and who would like to make big money by attacking the 8 Weilei. For example, Zhao Yan, Zeng Hong, Sun Yan, Jin Qingming all expressed their intentions to destroy Plaintiff with their guns.

431. Due to KWOK's and his accomplices' frequent harassment, SINO had been hospitalized from **November 24 to December 13, 2017**, in Flushing Hospital located at 4500 Parsons Blvd, Flushing, NY 11355. LIU visited SINO everyday at the visiting time in the afternoon. During that time period, LIU found that he was followed by Sun Yan several times.

432. To avoid being attacked by Sun Yan, LIU and SINO had to move to a new home right after SINO was discharged from Flushing Hospital in **December 2018**.

433. On **December 27, 2017**, SINO was invited by some of his friends to go to DIY KTV, located at 13335 Roosevelt Avenue, Flushing, NY KWOK 11354. SINO arrived there at about 7 PM. One hour later, Sun Yan showed up there without any invitation. When SINO told his friends that he was so scared about KWOK and his supporters, Sun Yan caught and hold SINO and poured a bottle of beer over SINO's head. Sun Yan shouted to SINO that "*I will beat you death if you criticize KWOK again.*" Then Sun Yan slammed his beer bottle on the wall to make it a sharp weapon like a knife and used it to attack SINO. Fortunately, Sun Yan was hold back by some of the servants of the KTV. SINO called 911 and police came over. The owner of the KTV tried to

clean up all the broken glasses before police came over and told police that nothing happened. SINO went to 107 precinct several times to report this case.

434. On **February 18, 2018**, SINO and LIU were invited by some of their friends to attend a meeting at Taiwan Center located at 137-44 Northern Blvd, Flushing, NY 11354, just 2 minutes walk away from their home. LIU and SINO arrived there at about 3PM. However, Sun Yan blocked LIU and SINO to enter the building. Sun Yan threatened to beat LIU and SINO. Sun Yan shouted at LIU and SINO that he would beat LIU and SINO to death if they criticize KWOK at the meeting, and he threatened that he had just arrested several times for assaulting other people, and he didn't care about being arrested another time. To avoid further conflict, LIU immediately asked SINO to go back home.

435. In the **April 14, 2018** live-streamed YouTube chats with Guo Baosheng, as shown in **Exhibit V-169**²⁵⁴, Zhao Yan stated that *"Ah, stab the anus with a bayonet, stab anus of LIU's. Oh, should stab Shit SINO's. The previous time was Li Hongkuan. Liu Gang, Yang Jianao is not afraid of you. You can bring Shit SINO and Eunuch Chen with you to meet me. I and Guo Baosheng will teach you a lesson tonight. And we can meet and talk next week."* Zhao Yan clearly stated that he wanted to come to LIU and SINO's home to harass them soon, and it was really happened just 4 days later, on **April 18, 2018**.

436. In the same video as show in **Exhibit V-169**, Guo Baosheng stated that *"LIU was issued a certificate of mental illness by hospitals. On the other hand, he didn't pay Child support to his son, it has been two years. I was told that he was living in shelter sponsored by the government. He lives in shelter for homeless. As a master of Peking University, He lives in shelter for homeless of the United States. Too shame! Too shame. KWOK told us all these ugly things about these Weilei."* What Guo Baosheng accused against LIU are simply a copy or restate of what KWOK repeatedly accused against LIU, such as mental illness, living in shelter, etc..

437. In the afternoon of **April 18, 2018**, LIU and SINO found Zhao Yan standing outside their home building. As Zhao Yan threatened earlier that he purchased new guns and would used

²⁵⁴ <https://youtu.be/9FsBOgtXUaU> (0:34-0:41) (27:07-27:40) (28:17-29:16)

it to kill LIU and SINO, LIU and SINO were so threatened and had to hide themselves all day in home. In the **May 11, 2018** live-streamed video, as shown in **Exhibit V-99**²⁵⁵, Guo Baosheng confirmed that he and Zhao Yan were sponsored by KWOK to come to New York to investigate LIU and SINO. It was KWOK who asked Zhao Yan to come New York to harass/stalk plaintiff.

438. Zhao Yan and Sun Yan repeatedly threaten LIU and SINO through live-streamed video, and they repeatedly called LIU and SINO to go out of their shelters to have a real fight with them.

439. Due to this kind harassment from KWOK and his supporters, LIU and SINO have been so scared to go out and they have isolated themselves for over one year now.

KWOK False Accused SINO by Buying Tainted Witnesses

440. On **May 9, 2017**, KWOK published a video of recording himself to his “郭文贵” YouTube account, as shown in **Exhibit V-29**²⁵⁶, wherein KWOK stated that “*SINO, you will be in prison forever. Especially Mr. SINO, you always dreamed of our central park, you will be naked in prison. Once you are in prison, you will be very vulnerable. Including Mr. Wei Shi, once you are in prisons, it will be too late to regret. Don't expect Xie Jiansheng and Zheng Jiefu to give you 2 billion. Think about it. Their future will be even worse than what you can imagine.*” Many viewers left comments or messages to this video and expressed their hates against SINO, some of them even expressed that they would kill SINO whenever they got chances.

441. KWOK almost posts videos or text through various social media or his GUO.MEDIA to threaten/defame/harass Plaintiff and other Chinese dissidents.

442. On or about **April 3, 2018**, a lady named Li Shuchun came to LIU and SINO's home located in 35th Ave, Flushing. Li Shuchun told SINO that it was Zhao Yan asked her to come. Once SINO heard Zhao Yan's name, SINO was so scared and believed that it was KWOK who had paid Zhao Yan to find someone to harass him again, just like what had happened previously to Xia Yeliang and LIU. Again, Zhao Yan cheated Li Shuchun to harass SINO and then they could

²⁵⁵ <https://youtu.be/LLyZtVciDHE?t=198> (3:19-14:16)

²⁵⁶ <https://youtu.be/qUNteNSEwmA?t=2041> (34:00-34:32)

find excuses to file lawsuit against him for raping or sexual harassment. SINO immediately asked Li Shuchun to leave. However, Li Shuchun refused to leave. SINO had to call 911 and made police reports, shown in **Exhibit V-173**.²⁵⁷ Li Shuchun was forced to leave SINO's home by police officers.

443. SINO was so afraid to be further harassed by those people sent by KWOK or Zhao Yan, and started hallucinations and couldn't stop thinking of suicide. To avoid such kind harassment, on or about **April 6, 2018**, SINO started to live in a shelter for homeless in Manhattan. Shelter could be the safe harbor for SINO to avoid being attacked by people sent by KWOK.

444. In the **April 13, 2018** live-streamed broadcasting video through his GUO.MEDIA, as shown in **Exhibit V-174**²⁵⁸, When asked him to dismiss the lawsuit against SINO, KWOK asserted that *"Dismiss SINO? You believe SINO? You can believe a shit of dog, but you can never believe SINO's words. He is garbage. He himself was rejected for his Asylum application, but he helps others to do asylum application. How can I dismiss him? It is impossible. How can you believe that? I will not dismiss him even he called me dad. This guy is ever worse than animals. He caught a petitioner, an old lady, harassed her sexually, slept her, and ruined her whole family. This animal is too evil. Not only I will not dismiss him, but also anyone else will not dismiss him."* After talking about Bannon and Mark Elliot Zuckerberg, KWOK further stated that *"Whoever offended me will be ended in two ways. If it is real misunderstood, will be still brothers, while those who have harmed me will have no future. You will see. Do you guys see anyone has good future if he happened offended me? For example, that Stephen Wen, look at his yacht, it was purchased at \$230, now he wants to sell it at \$150. He is over, guys, over. Those who had happened to fight against me are all ruined, all ruined."* KWOK clearly expressed his determination to destroy SINO. Again, KWOK mentioned that he had got tips about an old petitioner who claimed to be raped by SINO. Here KWOK was talking about what Li Shucun had done to SINO on or around **April 3, 2018**.

²⁵⁷ Complaint Report No.:3728

²⁵⁸ <https://youtu.be/Y6o1ff1NXXY> (3:36-5:28)

445. Combined KWOK's award announcements to call for people to false accuse the 8 "Weilei", KWOK's statements disclosed that that he had paid Zhao Yan to contact with Li Shuchun to harass and false accuse SINO for rapping.

446. In the **April 16, 2018**, live-streamed YouTube video, as shown in **Exhibit V-175**²⁵⁹, Zhao Yan stated that *"SINO, stop boasting for those hooligans, rogues, and gangsters. You will pay cost for what you have done. I will go to New York in couple of days and will give you a lesson. It was said that you will have court hearings soon. You will see that I will go to Court to confront you. Instead shooting behind like what Tang used to do, I will stand up at the court and face-to-face with you. We will see once you show up at the court."* Zhao Yan threatened SINO and that is just what KWOK requested him to do repeatedly. Zhao Yan also threatened that he will come to New York to give SINO a lesson, and it was really happened two days later, on April 18, 2018.

447. On **April 18, 2018**, in his live-streamed chat with Li Shuchun on YouTube video, as shown in **Exhibit V-176**²⁶⁰, Zhao Yan repeatedly defamed SINO and repeatedly asked Li Shuchun to report to police and to false accuse SINO.

448. Li Shuchun went to SINO's home to harass SINO on or around **April 3**. Ten days later, on **April 13**, KWOK accused SINO for sexual harassment against an old petitioner. And two weeks later, on **April 18**, Zhao Yan live streamed his conversation with Li Shuchun to accuse SINO and inspired Li Shuchun to false accuse SINO. As a billionaire, it is impossible that KWOK knows Li Shuchun and knows Li Shuchun came to SINO's home. As a resident in Washington, Zhao Yan came to New York to meet with Li Shuchun and made live-streamed video to talk about SINO. This video is exactly similar to the video to false accuse Xia Yeliang, as shown in **Exhibit V-97**²⁶¹. Everything was well designed and sponsored by KWOK.

449. Many people left comments after that video in which Zhao Yan chatted with Li Shuchun.

²⁵⁹ <https://youtu.be/WHjU1J0Uvwc> (32:42-33:37)

²⁶⁰ <https://youtu.be/oN6Un62BiiU> (8:24-12:38)

²⁶¹ https://youtu.be/K1xLSqBYM_k (0:00-18:20)

Out of these comments, over 90% expressed their hates against SINO and over 50% wanted to have SINO killed or be jailed.

KWOK Threatened LIU and Asked LIU to False Accuse SINO

450. In January 2017, KWOK contacted LIU through phone and asked LIU to work for him. KWOK told LIU that he knew all the traps and beautiful plan initiated by Chinese intelligent agencies targeting at LIU. KWOK told LIU that *"your only choice is surrender to me and work for me, otherwise, I will help those who are targeting at you to destroy you. You have to keep our conversations highly confidential, otherwise you will be executed. You must know that I have an extremely powerful team which can destroy anyone in this world. Don't try to escape."* LIU was so scared. Since then, LIU started his nightmare.

451. KWOK also repeatedly asked LIU to false accuse SINO. Exhibit V-177 lists some messages that KWOK sent to LIU on May 9, 2017. KWOK promised to give LIU large amount money first, then asked LIU to false accuse SINO and some other Chinese dissidents. KWOK provided to LIU some bank account information of Wei Shi's which had balance about \$390,000, but asked LIU to accuse Wei Shi having received \$40 million and SINO having received \$6 million from Chinese intelligent agencies. KWOK asked LIU to defame Wei Shi and SINO by publishing articles and videos on social media within 3 days.

452. LIU refused to repeat what KWOK asked him to do, especially refused to say SINO had received \$6 million and Wei Shi received \$40 million from Chinese intelligent agencies. KWOK was very upset and even angry at LIU. KWOK threatened LIU through phone: *"you will be destroyed or killed if you don't follow my orders." "Those who break our doctrines will be treated as traitors. You know how we execute traitors." "You must correct your traitor activities and must not disclose our secrets. I give you two weeks to do that."*

453. Ten days later, on May 21, 2017, as shown in Exhibit V-178²⁶², KWOK stated on Twitter that *"Mr. Liu Gang: I always considered you were a victim, and you apply ridicule style to fight against our common enemies. However, you treated Xia Yeliang, Tang Baiqiao, Zhao Yan,*

²⁶² <https://twitter.com/kwokmiles/status/866319852159598592>

Yang Jianao, etc. [badly] in the last few months. My friends were defamed as special agents again and again. Now you defame Gao Yu and her son. I was so shocked when I heard of that. I told you that I will break off friendship with you if you attack my friends! Now everything is over between you and I. Block you!" KWOK blocked LIU and called for all of his supporters to block LIU. Since then, KWOK repeatedly declared that LIU was his enemy and called for his supporters to block LIU on twitter, and to treat LIU as an evil enemy and need to be destroyed.

454. Besides Zhao Yan and LIU, many other people were also requested by KWOK to accuse and defame SINO. For example, Guo Baosheng, Wang Deli, Lu De, Yuan Hongbing, Cao Changqing, Yang Jianao, Han Shangxiao, are all comrades of KWOK and are all fighting for KWOK. None of them know SINO personally. However, each of them has posted videos on YouTube or tweets on Twitter to accuse and defame SINO, and they all called for their followers to block and defame SINO.

Part 13. DEFENDANTS' WILLFUL CAMPAIGN HAS HURT/DAMAGED

PLAINTIFF

455. Defendants have undertaken a willful campaign of harassment and intimidation against Plaintiff and some other Chinese dissidents personally, in an effort to cause them emotional distress resulted mental/psychiatric disease, and to further made Plaintiff suffered capability to support himself.

456. Defendant KWOK repeatedly stated that he had started several battlefields to fight against Plaintiff and 8 Weilei. Geneism, recruiting new fighters, starting his own media, chariot demonstrations, unrestricted legal warfare, etc., are just part of his campaign to cause Plaintiff emotional distress.

457. Defendant KWOK and his supporters repeatedly circulate his geneism beliefs to create hates against Plaintiff and to incite/solicit people to harass/defame Plaintiff.

458. Defendant KWOK had recruited/trained many accomplices and fighters to fight for him, including helping him to harass/stalk/monitor/defame Plaintiff.

459. Defendant KWOK repeatedly sponsored and organized the world-wide Chariot Show

demonstration to inflict emotional distress to Plaintiff intentionally.

460. Defendant KWOK has more money than Bin Laden, and he has recruited/trained more fighters than AL-Qaeda. In addition, he sponsored many media platforms to help him to defame/attack/harass other people. Defendant KWOK is so powerful financially as well as politically, and Plaintiff is so vulnerable, such that KWOK could easily destroy Plaintiff.

461. Defendants KWOK, Zhao Yan, and Guo Baosheng have large amount of followers and subscribers on social media.

462. As shown in **Exhibit V-179**, as of November 2017, 2018, KWOK's Twitter account @KwokMiles has roughly about half million followers, and had 6,444 tweets; as of May 9, 2018, Zhao Yan's Twitter account @zhaoyan818 has 106K followers, and had 7,643 tweets; as of May 9, 2018, Guo Baosheng's Twitter account @milpitas95035 has 118K followers, and had 28.5K tweets; whereas in early 2017 before they posted topics about KWOK, both Zhao Yan and Guo Baosheng had only few thousands followers on Twitter. That means most of their followers are interested in their topics about KWOK.

463. As shown in **Exhibit V-179**, as of May 9, 2018, KWOK has posted 249 videos to his 180K subscribers; Guo Baosheng has posted 627 videos to his 42K subscribers; and Zhao Yan has posted 327 videos to his 33K subscribers, all are on YouTube. Each of their single video has over 10K views, so each of them already have had 10 million views. Whereas each of KWOK's video normally have over 200K views, so KWOK's videos on YouTube should have over 50 million views.

464. Each of KWOK's video normally was republished by hundreds of his supporters, such as “澳洲之声”, “政事小哥”, “郭友之声”, “推特党”, etc..

465. In some of his live-streamed videos, KWOK repeatedly stated that each of his video had over hundred millions views. For example, in a conversation with He Ping, as shown in **Exhibit V-180**²⁶³, KWOK stated that *“You see my influence, whenever I post a twit, millions people immediately view it. The number of My YouTube subscribers is 3 million. Think about it, my*

²⁶³ <https://youtu.be/6yWkEOyINXU> (4:18-4:48)

number of followers was increased 120,000 in 3 days. The VOA interview has been viewed by 290,000. That means what? That means there are 5 million people to view my account, and that is only counted in North America. It should be 0.12 billion in the whole world. Today the viewer numbered 0.15 billion." KWOK clearly stated that his video on YouTube have roughly about 150 million views on one day!

466. KWOK also has his own media GUO.MEDIA, which has combined functions of YouTube and Twitter, such as live-videos and written statements. Most of the posts on GUO.MEDIA contains defamation statements against Plaintiff.

467. Through their large number of followers, defendants KWOK, Zhao Yan, Guo Baosheng propagated their defamation statements against Plaintiff to millions or even billions of viewers, and most of the viewers are influenced/believed the defamation statements, and some viewers were influenced to hate Plaintiff, and some of them were even incited/lured/paid to defame/harass/assault Plaintiff. As shown in **Exhibit V-181**, many of KWOK's viewers expressed their hates against Plaintiff and some of them even expressed their anxious to kill Plaintiff.

468. Before 2017, SINO had been known as a Journalist and a Chinese dissident. When google SINO's name online, people would normally find many news reports or books published by ²⁶⁴SINO. However, after KWOK publicly defamed SINO in January 2017, SINO's name has become an alternative name for 屎诺 (shit SINO), 恶棍 (villain), 骗子 (faker), etc., most of which are first or frequently used by KWOK to defame SINO, as shown in **Exhibit V-182**, wherein listed some google results for for Searching "屎诺+郭文贵" (shit SINO + KWOK), and some comments to one of KWOK's tweet on Tweeter. That means when you search "Shit SINO+KWOK" in Chinese, you will get a lot of KWOK's or his supporters' defamation statements against SINO.

469. Before 2017, LIU had been known as a well known Chinese dissident and a decent scientist. When google LIU's name online, people would normally find technical papers and books authored by LIU. However, after KWOK publicly defamed LIU in May 2017, LIU's name

²⁶⁴ <https://twitter.com/KwokMiles/status/900860594840096772>

has become an alternative name for 肛门(anus), 车震强奸犯(rapist in car), 坏蛋(gangster), 流氓(hooligan), 刘疯子(madman LIU), 刘精神病(mantel illness), etc., most of which are first or frequently used by KWOK to defame LIU. As shown in **Exhibit V-183** lists some google results for searching “瘤+肛+郭文贵” (LIU+Butt+ KWOK). It shows that when you google LIU and KWOK’s name plus Anus, you will find many KWOK’s or his supporters’ defamation statements against LIU.

470. KWOK, through Zhao Yan, bought privacy information from lawyer Ye Ning, including SINO’s passport information and LIU’s medical reports, and circulated Plaintiff’s privacy information to a large number of viewers through social media, such as YouTube, Twitter, and GUO.MEDIA.

471. Due to KWOK’s defamation statements against Plaintiff and his large amount award for false accusation against Plaintiff, many people are incited to defame/harass/accuse Plaintiff.

472. Sponsored by KWOK and KWOKs companies, Zhao Yan, Guo Baosheng had tried their best to defame/harass Plaintiff, and even tried to find several women to be tainted witnesses to false accuse Plaintiff for raping.

473. Lured by KWOK’s award for harassing/attacking Plaintiff, Sun Yan had tried several times to assault Plaintiff.

474. Lured/Paid by KWOK’s big award for false accusation against the 8 Weilei, Zhao Yan, Guo Baosheng, and Fu Kewei had stalked SINO and live-streamed their stalking process.

475. KWOK, through his company Golden Spring LTD., has paid/sponsored/lured many of his supporters, including Guo Baosheng, Zhao Yan, Fu Kewei, and Sun Yan to stalk/defame/harass/assault Plaintiff.

476. Due to Defendants’ repeatedly malicious statements and activities, Plaintiff has lost jobs and couldn’t find jobs, and lost capabilities to support himself, and has become disabled person.

477. Plaintiff used to do his own business to support himself, such as helping people to clean up kitchen or clear away mice or cockroaches. However, since June 2017, his clients have always rejected him to do such kind business, just because they heard the defamatory statements against

Plaintiff made by KWOK's and his accomplices', and have been so scared to contact with Plaintiff. Plaintiff's reputation has been completely ruined by Defendants.

478. Due to Defendants' repeatedly threatening statements and frequent harassment/stalking activities, Plaintiff was so scared to be stalked, harassed, or even killed. Plaintiff has to live in shelters repeatedly. Shelter could make Plaintiff feel safer for being harassed by KWOK's supporters.

479. Due to Defendants' extremely outrageous threatening statements or activities, Plaintiff has been scared to develop psychiatric illness and has been hospitalized repeatedly and has to see doctor regularly.

480. SINO has visited psychiatrist regularly since December 2017, and has been hospitalized for over 20 days.

481. KWOK, and other defendants activities are intentionally, malicious, outrageous, and extremely harmful to Plaintiff.

482. KWOK, Zhao Yan, Guo Baosheng, Sun Yan, and Fu Kewei, all have stated openly to destroy or to kill Plaintiff. They are intentionally to do malicious activities against Plaintiff.

Part 14. FIRST CAUSE OF ACTION

Battery

(Against Defendant Sun Yan)

483. Plaintiff repeats and realleges the allegations contained in the foregoing paragraphs as if fully set forth herein at length.

484. As set forth above, Defendant Sun Yan engaged in a series of continuous and related acts of physical violence against Plaintiff.

485. Defendant Sun Yan has physically hit, grabbed, punched Plaintiff.

486. Defendant Sun Yan's acts constitute a battery upon Plaintiff in that Defendant Sun Yan intentionally attempted to and did in fact physically attack and injure Plaintiff.

487. Defendant Sun Yan's wrongful bodily contact constituted a grievous affront to Plaintiff.

488. Defendant Sun Yan's wrongful bodily contact was intentional, unauthorized, and grossly

offensive in nature.

489. Defendant Sun Yan's wrongful bodily contact unwarranted, without any just cause or provocation and Defendant Sun Yan knew at all times that her actions were without the consent of the Plaintiff.

490. The injuries sustained by Plaintiff were caused wholly and solely by reason of the conduct described and Plaintiff did not contribute thereto.

491. As a direct and proximate result of the foregoing, Plaintiff was subjected to great physical and emotional pain and humiliation, was deprived of his liberty and was otherwise damaged and injured.

492. As a direct and proximate result of the foregoing, Plaintiff has been damaged in an amount to be determined at trial.

Part 15. SECOND CAUSE OF ACTION

Assault

(Against Defendant Sun Yan)

493. Plaintiff repeats and realleges the allegations contained in the foregoing paragraphs as if fully set forth herein at length.

494. As set forth above, Defendant Sun Yan engaged in a series of continuous and related acts of physical violence against Plaintiff.

495. Defendant Sun Yan has physically hit, grabbed, and punched Plaintiff.

496. Defendant Sun Yan's acts constitute an assault upon Plaintiff in that Defendant Sun Yan intentionally threatened to and did in fact physically attack and injure Plaintiff.

497. Defendant Sun Yan's wrongful bodily contact constituted a grievous affront to Plaintiff.

498. Defendant Sun Yan's threatened and actual wrongful bodily contact was intentional, unauthorized, and grossly offensive in nature.

499. Defendant Sun Yan's threatened and wrongful bodily contact unwarranted, without any just cause or provocation and Defendant Sun Yan knew at all times that her actions were without the consent of the Plaintiff.

500. The injuries sustained by Plaintiff were caused wholly and solely by reason of the conduct described and Plaintiff did not contribute thereto.

501. As a direct and proximate result of the foregoing, Plaintiff was subjected to great physical and emotional pain and humiliation, was deprived of his liberty and was otherwise damaged and injured.

502. As a direct and proximate result of the foregoing, Plaintiff has been damaged in an amount to be determined at trial.

Part 16. THIRD CAUSE OF ACTION

Defamation Per Se

(Against Defendants KWOK, Zhao Yan, Guo Baosheng, and Sun Yan)

503. Plaintiff incorporates by reference all preceding and succeeding paragraphs of this Complaint.

504. Through speech, postings to social media accounts and websites, and various other writings aforesaid, Defendant KWOK has falsely and repeatedly defamed Plaintiff, including but not limited to statements meant to convey (i) that Plaintiff has and continue to engage in outrageous acts of criminality, such as cyber-attacking, raping, and KWOK had sponsored Zhao Yan and Guo Baosheng to find women to false accuse Plaintiff for raping, (ii) that Plaintiff was a paid agent and received \$6 million from CCP, (iii) that Plaintiff was so worthless and so poor, such that couldn't do anything in the last 28 years, couldn't support his parents and children, and he should commit suicide, or should be killed.

505. These statements have been read and circulated by countless individuals.

506. These statements have been circulated by Defendants Zhao Yan, Guo Baosheng, and Sun Yan through speeches and postings to social media accounts and websites.

507. These repeated harmful statements have damaged Plaintiff's reputation among large number of people, and have caused many individuals to doubt Plaintiff's capability and credibility.

508. Defendants KWOK, Zhao Yan, Guo Baosheng, and Sun Yan all know that these

statements are false or harmful to Plaintiff, or have at least acted with reckless disregard as to the truth of such statements.

509. Defendants KWOK, Zhao Yan, Guo Baosheng, and Sun Yan made these statements with the intent of maliciously damaging Plaintiff, his reputation and his career, and to induce third parties not to do business with him.

510. Defendants KWOK, Zhao Yan, Guo Baosheng, and Sun Yan have no authorization to make these false/harmful statements nor are they protected by any privilege.

Part 17. FOURTH CAUSE OF ACTION

Defamation

(Against Defendants KWOK, Zhao Yan, Guo Baosheng, and Sun Yan)

511. Plaintiff incorporates by reference all preceding and succeeding paragraphs of this Complaint.

512. Through speech, postings to social media accounts and websites, and various other writings aforesaid, Defendant KWOK has falsely and repeatedly defamed Plaintiff, including but not limited to statements meant to convey (i) that Plaintiff has and continue to engage in outrageous acts of criminality, such as cyber-attacking, raping, and KWOK had sponsored Zhao Yan and Guo Baosheng to find women to false accuse Plaintiff for raping, (ii) that Plaintiff was a paid agent and received \$6 million from CCP, (iii) that Plaintiff was so worthless and so poor, such that couldn't do anything in the last 28 years, couldn't support his parents and children, and he should commit suicide, or should be killed.

513. These statements have been read and circulated by countless individuals.

514. These statements have been circulated by Defendants Zhao Yan, Guo Baosheng, and Sun Yan through speeches and postings to social media accounts and websites.

515. These repeated harmful statements have damaged Plaintiff's reputation among large number of people, and have caused many individuals to doubt Plaintiff's capability and credibility.

516. Defendants KWOK, Zhao Yan, Guo Baosheng, and Sun Yan all know that these

statements are false or harmful to Plaintiff, or have at least acted with reckless disregard as to the truth of such statements.

517. Defendants KWOK, Zhao Yan, Guo Baosheng, and Sun Yan have no authorization to make these false/harmful statements nor are they protected by any privilege.

518. Defendants KWOK, Zhao Yan, Guo Baosheng, and Sun Yan made these statements with the intent of maliciously damaging Plaintiff, his reputation and his career, and to induce third parties not to do business with him.

519. Plaintiff has suffered harm as a result of conducts of Defendants KWOK, Zhao Yan, Guo Baosheng, and Sun Yan, in a monetary amount to be determined at trial.

Part 18. FIFTH CAUSE OF ACTION

Intentional Infliction of Emotional Distress

(Against Defendants KWOK, Zhao Yan, Guo Baosheng, Sun Yan, and Fu Kewei)

520. Defendants KWOK, Zhao Yan, Guo Baosheng, and Sun Yan made and circulate these statements, as well as the others identified above, with the intent to cause severe emotional distress to Plaintiff, or at the least, they have made these statements while recklessly disregarding the substantial likelihood that they would cause Plaintiff emotional distress.

521. These statements have been read, viewed, and heard by countless individuals.

522. Defendants KWOK, Zhao Yan, Guo Baosheng, and Sun Yan know these statements are false, or at the very least they have made these statements with reckless disregard for their truthfulness. Their repeated publishing of these false claims regarding Plaintiff constitutes extreme and outrageous conduct.

523. Defendants KWOK, Zhao Yan, Guo Baosheng, and Sun Yan engaged in intentional conduct to harass and intimidate Plaintiff, including by themselves or by sending sending their agents/supporters/aids to follow or threaten Plaintiff; surveillan Plaintiff's home; investigate Plaintiff's personal and business bank transactions; and disclose Plaintiff's sensitive personal information including medical report in video and postings. Furthermore, all Defendants knew that Plaintiff had been targeted by CCP for the last 28 years and had been very vulnerable. They

all knew that they could get financial/political benefits from CCP by defaming/attacking Plaintiff. The campaign of harassment and intimidation against Plaintiff, started by Defendants KWOK, Zhao Yan, Guo Baosheng, and Sun Yan, constitute extreme and outrageous conduct.

524. In addition, Defendant KWOK's conducts are extreme and outrageous due to:

- (i) KWOK used to have a pattern to do intentional infliction of emotional distress to many other people, such as putting Li You, Liu Zhihua, Qu Long, Zhao Yunan, and many others into jail by defamatory statements or by false accusation;
- (ii) KWOK currently has a new pattern: inciting/buying/soliciting other people to defame/destroy/harass those he was targeting at; what KWOK has done to Plaintiff follows his usual pattern of conduct;
- (iii) to defame the Plaintiff is not an isolated incident, KWOK has listed 8 Chinese dissidents as his first round targets, and listed 91 other people as his second round targets;
- (iv) KWOK is powerful financially and politically, he repeatedly stated that he would spent \$20 billion and his powerful networks with political figures including President Trump, Bill Gertz, and Steve Bannon to make Plaintiff to be in and to die in prison;
- (v) based on his racial epithets, KWOK is targeting at a specific group who are poor, ugly, Chinese dissidents.

525. Defendants KWOK, Zhao Yan, Guo Baosheng, Sun Yan, and Fu Kewei have made these statements, and committed acts of intimidation through his representatives, with the intent to cause severe emotional distress to Plaintiff, or at the least, they have made these statements and committed acts of intimidation by themselves or by luring/inciting/awarding other people whilst recklessly disregarding the substantial likelihood that these statements and actions would cause Plaintiff severe emotional distress. Directly, because of these false and outrageous statements, and intentional actions, Plaintiff has experienced at least the following: severe emotional distress, shame, anxiety, emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, suicide, hospitalized several times, and other non-pecuniary losses.

526. Fu Kewei, along with Zhao Yan and Guo Baosheng had stalked/followed Plaintiff and made Plaintiff and Plaintiff's family members very scared.

WHEREFORE, Plaintiff requests entry of Judgment in his favor and against Defendants KWOK, Zhao Yan, Guo Baosheng, Sun Yan, and Fu Kewei as follows:

- 1) compensation and punitive damages in an amount to be determined at trial, but no less than \$100 million from KWOK, no less than \$1 million from Zhao Yan, no less than \$1 million from Guo Baosheng, no less than \$2 million from Sun Yan, and no less than \$1 million from Fu Kewei;
- 2) enjoining Defendants KWOK, Zhao Yan, Guo Baosheng, Sun Yan, Fu Kewei and anyone acting or purporting to act on their behalf from making any of the false and defamatory statements set forth herein, or similar false and defamatory statements involving Plaintiff;
- 3) punitive damages;
- 4) the costs and expenses incurred in this action including attorneys' fees;
- 5) Defendant KWOK frequently stated that he would spent \$20 billion of his money to destroy those whom he was targeting at. KWOK listed 91 people as his most wanted list and to be destroyed. KWOK should be punished to a degree such that he couldn't afford to start any defamatory campaign against other people; and
- 6) such other and further relief as the Court deems just and proper.

Part 19. DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury.

Dated: New York, New York
May 16, 2018

Respectfully submitted,

/s/ Xiong Xianmin

Xiong Xianmin, Pro Se

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